

EXHIBIT 4

1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

LISA J. PRIESTER,
INDIVIDUALLY, AND AS
PERSONAL REPRESENTATIVE OF
THE ESTATE OF DAVID A.
PRIESTER, JR.,

Plaintiff

No. 2:14-CV--01108-DCN

vs.

FUTURAMIC TOOL &
ENGINEERING COMPANY; CAPITAL
WELDING, INC.; MCMASTER-CARR
SUPPLY COMPANY; AND INTEC
AUTOMATED CONTROLS, INC.,

Defendants

Deposition of: DARYL L. EBERSOLE, P.E.

Taken by : MARK H. WALL, Esquire

Before : JOYCE A. WISE, RMR

Date : February 19th, 2016

Place : Robson Forensics
354 North Prince Street
Lancaster, PA 17603

JOYCE A. WISE, RMR, (717) 299-8091

2

APPEARANCES:

KURT ROZELSKY, ESQUIRE
Smith Moore Leatherwood
2 West Washington Street, Ste. 1100
Greenville, South Carolina, 29601
kurt.rozelsky@smithmoorelaw.com
(864) 751-7624
For - Futuramic Tool & Engineering Company and
Capital Welding, Inc.

KEVIN R. DEAN, ESQUIRE
Motley Rice, LLC
28 Bridgeside Blvd.
Mt. Pleasant, South Carolina, 29464
kdean@motleyrice.com
(843) 216-9152
For - Lisa J. Preister

MARK H. WALL, ESQUIRE
Wall Templeton
145 King Street, Ste. 300
Post Office Box 1200
Charleston, South Carolina, 29402
mark.wall@walltempleton.com
(843) 329-9500
For - SAR

CURTIS W. DOWLING, ESQUIRE
Barnes/Alford
P.O. Box 8448
Columbia, South Carolina, 29202
curtis@basilaw.com
(803) 451-4515
For - Intec Automated Controls, Inc.

JOYCE A. WISE, RMR, (717) 299-8091

3

INDEX TO WITNESS

EXAMINATION

Daryl L. Ebersole, P.E.

By Mr. Wall:

By Mr. Rozelsky:

4

INDEX TO EXHIBITS

MARKED

Exhibit No. 98 - CV

Exhibit No. 99

Exhibit No. 100

Exhibit No. 101

4

JOYCE A. WISE, RMR, (717) 299-8091

4

P R O C E E D I N G S
9:17 A.M.

It is hereby stipulated by and between counsel for
the respective parties that sealing, certification and
filing are hereby waived; and that all objections, except as
to the form of the question, are reserved to the time of
trial.

(Deposition Exh. Nos. 98 and 99 marked.)

DARYL L. EBERSOLE,
called as a witness, having been duly sworn or affirmed,
was examined and testified as follows:

EXAMINATION

BY MR. WALL:

Q. Mr. Ebersole, please state your full name for
the record.

A. Daryl Lynn Ebersole.

Q. And where are you employed?

A. Robson Forensics.

Q. And you've given depositions before, I'm sure?

A. Yes, I have.

Q. You know the rules?

A. I think so.

Q. Ours is sort of a Texas rule. If you have any
questions, you're gonna direct them to me, not to the
attorney that hired you.

Do you understand that?

A. I do.

Q. And people are going to say object to the form

JOYCE A. WISE, RMR, (717) 299-8091

1 of the question. But you still answer the question,
2 unless someone somehow tells you not to answer the
3 question.
4 Do you understand that?
5 A. Yes, I do.
6 Q. I've been given your CV.
7 Is that a current copy of your CV?
8 A. Based on the date in the corner, it appears to
9 be the current copy.
10 Q. Okay. No changes to that that you're aware of?
11 A. That's correct.
12 Q. All right. And we have the trial testimony that
13 was provided, which would be Exhibit Number 99.
14 A. Yes.
15 Q. Okay?
16 A. That's correct.
17 Q. Can you look at your CV for a second?
18 And if you'll turn to the presentations or
19 papers or anything else, have you ever had a presentation
20 or delivered a paper on issues similar, the ones we have
21 now, Allen Bradley, PLC?
22 A. Well, I provided training to people that were
23 employed by the same -- you know, for co-workers within
24 organizations I worked for, but I believe nothing that
25 would be in the category you're referring to.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. Okay. Have you ever given any speeches or any
2 papers on the issue of -- there's a word that has escaped
3 me all of a sudden, I can't think what I want to say --
4 commissioning -- of commissioning?
5 A. Well, again, I would have -- there would have
6 been aspects of that with co-workers within my employment,
7 but not, again, in the category that you're referring to.
8 Q. Would you -- do you have a written definition of
9 commissioning anywhere?
10 A. You'd like my definition or you'd like a
11 written --
12 Q. No, I want to know whether you're aware -- I'll
13 get to your definition in a minute.
14 Is there anywhere that you know of a definition
15 of commissioning which is in some article?
16 A. Well, I believe there are general definitions,
17 but offhand, I'm not certain if there's a specific one for
18 that word.
19 Q. Okay. It's your word, correct?
20 You use the word commissioning in your report,
21 correct?
22 A. Yes, I do.
23 Q. All right. And you do not have or are not aware
24 of a written definition of that word anywhere in the
25 literature, scientific literature?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. I'd have to check.
2 Q. You've never run across it before?
3 A. Offhand, I'm not sure.
4 Q. What is your personal definition of the word
5 commissioning?
6 A. Well, commissioning equipment refers to starting
7 it up, verifying operation, verifying that all
8 requirements are met, verifying safety aspects.
9 Q. And is that, generally speaking, the job of the
10 builder of the machine or equipment before being turned
11 over to the owner, or the purchaser?
12 A. There are aspects of commissioning that relate
13 to all people who build and manufacture and install and
14 program and wire and test equipment.
15 Q. Let's assume that a piece of equipment is in
16 operation. It's performing its intended purpose.
17 And then five months later, an addition to the
18 memory or the PLC of that piece of equipment is installed,
19 is that a second commissioning or a third commissioning?
20 MR. ROZELSKY: Object to the form.
21 THE WITNESS: Well, there would be aspects of
22 commissioning for that work that would take place.
23 BY MR. WALL:
24 Q. Okay. Then you would agree that if you make
25 some addition to the piece of equipment, you are not

JOYCE A. WISE, RMR, (717) 299-8091

1 re-commissioning the entire piece of commission -- or the
2 entire piece of equipment, you're only, quote,
3 commissioning, your language, that portion of the work
4 that you were doing?
5 MR. ROZELSKY: Object to the form.
6 MR. DEAN: Object to the form.
7 THE WITNESS: That's not what I said.
8 I think what is part of commissioning is
9 verification of operation testing.
10 And the extent of the commissioning that is
11 necessary is dependent upon the details that surround what
12 is being done and what has been done.
13 BY MR. WALL:
14 Q. So five months later, I go in and add a new
15 function to the PLC.
16 Have I assumed the duty of re-commissioning,
17 using your term, the entire purpose for which that machine
18 was intended?
19 MR. ROZELSKY: Object to the form.
20 THE WITNESS: Well, there are details that would
21 be -- that would be dependent upon, that would relate to
22 what is part of what is being commissioned as part of
23 what's been done, what needs to be done, what has been
24 tested previously.
25

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1 BY MR. WALL:
2 Q. So would you agree with me then the effective
3 commissioning for later work is dependent upon that work
4 which you are commissioned to do before the
5 re-commissioning of the machine?
6 MR. DEAN: Object to the form.
7 MR. ROZELSKY: Object to the form.
8 THE WITNESS: No, mine -- there's many details
9 that require consideration for the -- what state you're
10 picking up a piece of equipment and what state you're
11 advancing the piece of equipment. And that is part of
12 what needs to be determined -- needs to be used to
13 determine what commissioning is for when the work is done.
14 BY MR. WALL:
15 Q. If the original manufacturer commissions and
16 turns over a piece of equipment and then a sub-contractor
17 comes in and adds sensors, for example, to the PLC, is
18 that new contractor responsible for the entire -- in your
19 opinion, the entire commissioning of the piece of
20 equipment?
21 MR. ROZELSKY: Object to the form.
22 THE WITNESS: It will depend on what state
23 things -- you are picking it up, what communication has
24 taken place, what needs to be done, and what needs to be
25 done to make things safe.

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1 BY MR. WALL:
2 Q. We are jumping way ahead.
3 Let's talk about this case.
4 You're aware that approximately five months
5 after this piece of equipment went into service, because
6 the laser sensors could not pick up the material that was
7 being used to make the body of the airplane, that Intec
8 came in and re-installed new sensors to pick up the
9 equipment?
10 MR. DEAN: Object to the form.
11 MR. DOWLING: Object to the form.
12 BY MR. WALL:
13 Q. To pick up pieces of material. Are you aware of
14 that?
15 MR. DEAN: Object to the form. It
16 mischaracterizes the evidence in the case.
17 BY MR. WALL:
18 Q. Are you aware of that?
19 A. I'm aware that there was work that was done at
20 various times along the timeline.
21 Q. Well, are you aware that according to the
22 timeline, but again by your company, on 4/26/13, Intec
23 finally got around to making sensors that Futuramic
24 installed into the machine to pick up the material that
25 was being worked on?

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1 MR. DEAN: Object to the form.
2 MR. DOWLING: Object to the form.
3 THE WITNESS: I don't believe that Intec made --
4 as you described made sensors or I think you used the word
5 made sensors?
6 BY MR. WALL:
7 Q. You're not aware that Intec was commissioned --
8 was asked by Futuramic to go and re-work their sensors
9 because the sensors they originally placed on the machine
10 would not detect material that was being worked on?
11 A. I'm aware that there were sensor changes that
12 came later.
13 Q. Are you aware that according to your timeline
14 that occurred on 4/26/13?
15 A. I don't know the date offhand, but that sounds
16 approximately right.
17 Q. Let me hand you the timeline done by your
18 company.
19 Have you seen that before?
20 A. I believe I may have.
21 Q. That was prepared by Mr. Eckert. At least it
22 was part of his report.
23 A. Yes.
24 Q. Did you talk to Mr. Eckhardt after he did his
25 report or while he was doing his report?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. At various times I did.
2 Q. How about did he talk to you as you were doing
3 your report?
4 A. At various times.
5 Q. Okay. We'll get into that later.
6 This -- if you look at Exhibit 99, that's your
7 testimony record for the last four years.
8 Unlike some lawyers, I don't need to go through
9 every one of these things. But --
10 MR. ROZELSKY: Object to the form.
11 BY MR. WALL:
12 Q. Could you tell me whether or not any of these
13 testimonies that you provided for us involve an issue
14 similar to this; that is, a PLC and/or commissioning?
15 A. I'll just review the document for a moment, if I
16 could?
17 Q. Sure, please. Take your time. We have an hour
18 and a half.
19 A. Well, the first one I would point to is under
20 deposition. And I'm trying to see why it's not also
21 listed under trial, because it did go to trial, so I need
22 to look at that.
23 But the first one I would refer to is under
24 Deposition Number 5.
25 Q. Okay.

JOYCE A. WISE, RMR, (717) 299-8091

1 A. Which relates to programmable equipment and
2 control of the Metro Subway in Washington, D.C.
3 Q. All right. Could you give me anymore
4 information than that?
5 A. That some details of the case were that it had
6 to do with the control of the doors that the passengers
7 stepped through.
8 Q. Do you keep -- since you have a list of them, do
9 you keep copies of your depositions?
10 A. No, I don't.
11 Q. Any other matter that you think -- do you think
12 is similar to this?
13 A. Under depositions, Number 10.
14 Q. What was that case about?
15 A. The case was about the PLC control of a
16 horizontal boring machine, milling machine.
17 Q. Any others?
18 A. Number 15 was -- well, I should wait if you have
19 a question about 15.
20 Q. Yeah, tell me what it was about.
21 A. 15 was about a programmed crane, large crane,
22 that toppled over at the National Cathedral in Washington,
23 D.C.
24 21 is about an electronic control for a
25 treadmill. And I guess -- is your question relative to as

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1 far as commissioning?
2 Q. Commissioning, also.
3 A. Yes. So these were all control ones.
4 And there would be other ones potentially, too.
5 And these are ones with control and certain aspects for
6 commissioning.
7 Q. You gave me numbers 5, 10, 15 and 21.
8 In Number 5, did you testify on that for
9 plaintiff or defendant?
10 A. For Number 5, I was engaged by the plaintiff's
11 representative.
12 Q. And you found that the defendant breached the
13 standard of care and provided them the PLC information?
14 A. It was a programmable control and it had to do
15 with the door controls and the interlock with the brakes.
16 Q. Number 10, represented plaintiff or defendant?
17 A. For that I was engaged by the plaintiff's
18 representative.
19 Q. And Number 15?
20 A. Number 15, I was engaged by the defendant's
21 representative, although there were cross claims.
22 Q. And you found that the defendant properly did
23 the connections with the PLC?
24 A. The programmed control and the opinions that I
25 had related to the data collection for that, had to do

JOYCE A. WISE, RMR, (717) 299-8091

1 with the commissioning of the crane and review of data
2 relative to operator actions and what the data recording
3 showed, and also with the commissioning.
4 There were certain drifting that occurred and
5 there were certain aspects related to that commissioning.
6 Q. And found it was done appropriately?
7 A. I found that the data showed that the crane
8 drifted with no activation of the controls by the crane
9 operator at the time that it toppled over.
10 Q. And that would have been inappropriate, I
11 assume? It should not have drifted?
12 A. That's correct.
13 Q. How about 21?
14 A. 21 has to do with --
15 Q. Who retained you?
16 A. Oh, the plaintiff's representative.
17 Q. And what did that one have to deal with?
18 A. Had to do with the programmed controller and
19 power distribution and how it would influence that and
20 what was done as part of the commissioning of those in
21 preparation for their installation.
22 Q. What kind of equipment was it?
23 A. That was the treadmill.
24 Q. Oh, that's right.
25 And this was an individual person treadmill in

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1 the fitness center?
2 A. Yes, it was.
3 Q. I have reviewed your bills -- or the company's
4 bills, which are Exhibit 89 to this deposition.
5 Have you gone back and reviewed those bills?
6 A. Not in detail.
7 Q. Well, there's no detail on them, so -- but we'll
8 get into that, also.
9 It appears that you were first involved in this
10 case on November 8th, 2015.
11 Do you have a copy of your bill in front of you?
12 A. No, I don't.
13 Q. I can give you the whole bill if you want to go
14 further through it.
15 A. That sounds approximately correct.
16 So I could look at the others, if you'd like me
17 to, but I don't think I have to.
18 Q. Who asked you to become involved in this case?
19 A. My first communications would have been with
20 Peter Coste and with Bart Eckhardt.
21 Q. Who is Peter Coste?
22 A. Peter Coste is an electrical engineer in our
23 firm.
24 Q. Why did he come to you?
25 A. I'm the practice group leader for the electrical

JOYCE A. WISE, RMR, (717) 299-8091

1 engineering group. And so I had certain knowledge of the
2 case prior to that through his work.

3 And so actually I'm not certain if it would
4 have -- as far as my involvement first come from Bart or
5 from Peter. But it would have been one of those two.

6 Q. Whoever came to you first, what did they ask you
7 to do?

8 A. Well, we talked about the details of the case
9 and what was being investigated. And I had certain
10 background knowledge prior to that.

11 And I was asked to assist and join the team of
12 the investigators.

13 Q. Did Mr. Eckhardt tell you that he was unable to
14 come up with any issues or negligent acts on part of SEL
15 and he needed to get you involved to try to come up with
16 something against SAR? Not SEL.

17 MR. DEAN: Object to the form.

18 THE WITNESS: No, he didn't. He talked about me
19 potentially joining for investigating, and in particular,
20 investigating aspects of the control system.

21 BY MR. WALL:

22 Q. You're aware that Mr. Eckhardt had no -- found
23 no fault with anything that SAR did directly on the
24 machine?

25 MR. DEAN: Object to the form of the question.

JOYCE A. WISE, RMR, (717) 299-8091

1 BY MR. WALL:

2 Q. Correct?

3 A. Well, I think, you know, we took this
4 investigation and we determined what would be appropriate
5 for such an investigation when it relates to aspects of
6 the control system. And I believe that he deferred those
7 types of aspects over to me.

8 Q. You're aware the control system was in place at
9 the time that Futuramic delivered the machine to the
10 Boeing plant and turned it over to Boeing for its use,
11 correct?

12 MR. DOWLING: Object to the form.

13 THE WITNESS: I believe that mischaracterizes
14 the situation.

15 BY MR. WALL:

16 Q. How does it mischaracterize the situation?

17 A. What was done, as my understanding, at the point
18 that it was shipped was that there had been preliminary
19 testing done and that there would be continuation of the
20 control system at the Boeing location.

21 Q. Which was done. And then Futuramic turned to
22 Boeing and said, it's your machine, correct?

23 MR. DEAN: Object to the form.

24 BY MR. WALL:

25 Q. Correct?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. I believe that mischaracterizes as far as the
2 sequence.

3 Q. Well, on 11/23, Futuramic finished -- according
4 to your own timeline, Futuramic finished all mechanical
5 and electrical assembly of the platform, correct?

6 A. I believe that's approximately correct.

7 Q. And then --

8 A. I don't have it in front of me here.

9 Q. And then Boeing took it over. And then Boeing
10 went to -- because it now owned the machine, went to SAR
11 and said, please do what we contracted with you to do, is
12 that correct?

13 MR. DEAN: Object to the form.

14 THE WITNESS: I believe that mischaracterizes --

15 BY MR. WALL:

16 Q. How does it mischaracterize?

17 A. SAR proposed to interact with the machine
18 developer and they proposed to add brakes. And they
19 proposed to be the commissioner for the control system at
20 Boeing's facility.

21 And so SAR injected themselves into this as a
22 re-manufacturer of this lift.

23 Q. I understand that's your position.

24 Do you have a single document which establishes
25 that SAR interacted with Futuramic or with Intec prior to

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1 working on the brakes as requested by Boeing?

2 A. What I have is a document where SAR proposed to
3 interact with the machine developer for the -- for the
4 work on the machine, including the commissioning.

5 Q. What document is that?

6 A. That's the SAR proposal.

7 Q. All right. That was not with Futuramic. That
8 was with Boeing, correct?

9 A. It was a proposal to Boeing.

10 Q. Correct. And it was a contract with Boeing,
11 correct?

12 A. That's my understanding.

13 Q. And you have it right in front of you?

14 A. Yes, I do.

15 Q. All right. And Boeing told SAR what to do,
16 correct?

17 MR. DEAN: Object to the form.

18 THE WITNESS: What was your question?

19 BY MR. WALL:

20 Q. Boeing told SAR what to do?

21 A. There was communication that took place and SAR
22 promised to work with the platform general supplier in
23 order to implement the logic for slider operation.

24 Q. Where did it say work with the supplier?

25 A. Page 4 of 6. I believe you're in a different

JOYCE A. WISE, RMR, (717) 299-8091

1 document actually.
2 Q. I'm working with the Statement of work.
3 A. I'm looking at the Proposal, like I described.
4 Q. Here's the Statement of work. Here's the actual
5 contract.
6 If you look at the bottom, could you please give
7 us the exhibit number?
8 A. You'd like the exhibit number for what you just
9 handed me?
10 Q. Yeah, correct.
11 A. It appears to be Exhibit 5.
12 Q. Okay. That's the actual contract.
13 MR. DEAN: Object to the form.
14 BY MR. WALL:
15 Q. Correct?
16 A. This includes a Statement of work and it
17 includes invoices.
18 Q. Let's go back to your -- do you see where it
19 says that SAR is gonna deal with the -- Futuramic or
20 Intec?
21 A. Well, it's certainly implied, if it's not --
22 Q. Do you see where it says that?
23 MR. DEAN: Object to the form.
24 BY MR. WALL:
25 Q. Do you see where it says that?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. It's certainly implied, if it doesn't say it
2 specifically.
3 (Deposition Exhibit No. 100 marked.)
4 BY MR. WALL:
5 Q. And I just marked as Exhibit Number 100 the
6 document you were talking about. And on 406, where does
7 it say that SAR is gonna deal directly with Futuramic or
8 with Intec?
9 You said 406.
10 A. Yes. I'm reading from the scope of work and it
11 says work with platform -- on Page 406, under scope of
12 work, it states work with platform general supplier in
13 order to implement logic for slider operation.
14 Q. Right. And those are the brakes?
15 A. Slider operation includes brakes, but it
16 includes motors, and it includes things that relate to
17 alarms for sliders.
18 Q. The only thing that SAR was doing was installing
19 redundant brakes, correct?
20 MR. ROZELSKY: Object to the form.
21 MR. DOWLING: Object to the form.
22 THE WITNESS: No.
23 BY MR. WALL:
24 Q. Now, you talked about the timeline.
25 It's part of the exhibit that's previously in by

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1 Mr. Eckhardt.
2 Do you find anything wrong with that timeline?
3 A. I don't immediately see something that I would
4 find incorrect.
5 Q. Okay. In your research and review of your
6 documents, did you review the examination done by Boeing
7 after this event that took place between March 26 and
8 April 1?
9 A. I'm aware of a document that they prepared.
10 Is that the one you're referring to?
11 Q. Yes. Did you review it?
12 A. Yes, I did.
13 Q. And did you find anything incorrect about it?
14 A. Well, I believe that it draws conclusions that
15 can't be drawn about the nature in which he fell.
16 For example, the details are consistent with him
17 having tripped and fallen into the hole.
18 Q. So it's your opinion that Boeing did not do a
19 full and proper investigation of this incident?
20 A. Well, my familiarity with their investigation is
21 what the document that they wrote as to the breadth of
22 their talking through details with people, what was
23 observed, that that one strikes me as a potential error.
24 Q. Anything else that Boeing did wrong in that
25 investigation?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. Well, I don't believe that their investigation
2 was to the breadth of machine design, to the extent that
3 they -- and I guess in their defense, I don't believe they
4 have the familiarity with this type of equipment and the
5 types of standards and things that are required, such as
6 those things that I've identified in my report.
7 Q. How many similar machines do you think Boeing
8 owns, similar to this one? Fifty, a hundred?
9 MR. DEAN: Object to the form.
10 THE WITNESS: I'm not aware of any before this
11 one that had the type of control that this one had and the
12 type of characteristics this one had for potential for
13 control system problems.
14 BY MR. WALL:
15 Q. Ever been to Seattle?
16 A. No, I haven't.
17 Q. Now, I was talking about the investigation that
18 Boeing did of the equipment after the injury, not the
19 investigation of the injury.
20 Did you review that? That is, Boeing took the
21 machine offline and went and brought Intec and Futuramic
22 here and did a complete investigation of the entire piece
23 of equipment, correct? And that happened between March 26
24 and April 1, to review that.
25 A. Well, maybe since we want to verify we're

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1 talking about the same document --

2 Q. There are two documents. One is the root cause
3 and one is the investigation of the incident.

4 A. I am just reviewing my report regarding the
5 documents that I reviewed.

6 Q. I didn't see it in there. That's why I'm asking
7 the question.

8 A. Under materials available for review, Page 1 of
9 my report, under B-3, I identify a certain report.

10 Is that perhaps the one you're referring to?
11 There may be others here.

12 Q. B-3, that's a troubleshooting. Yes, that's one
13 of them I'm talking about.

14 And that's the one that they found there was no
15 electrical or mechanical problem with Slider Number 2,
16 correct?

17 A. That's incorrect.

18 Q. Number 2 is the troubleshooting log that you're
19 talking about, right?

20 A. I'm reading things that are in that report where
21 they identified a problem with Slider 2 and it's having a
22 double flashing green light in that report. It is
23 identified at F on Page 7 of my report.

24 Q. That they went in and tested Slider Number 2 and
25 turned the machine back on and it worked properly,

JOYCE A. WISE, RMR, (717) 299-8091

1 correct?

2 A. After it was reset it did, yes.

3 Q. And they could not find any defect in Slider
4 Number 2, correct?

5 MR. DEAN: Object to the form of the question.

6 THE WITNESS: They could not replicate what had
7 occurred is my recollection.

8 BY MR. WALL:

9 Q. Now, you also report on Number 9 that you
10 actually did read the investigation, and it's your opinion
11 that Boeing didn't know what happened, and that you think
12 that the plaintiff somehow stumbled and fell into the hole
13 that he created?

14 A. I'm gonna ask you to repeat that. I apologize.

15 Q. Sure.

16 We already talked about Number 9. That's the
17 investigation. And it's your opinion that Boeing didn't
18 know what they were doing when they said that he just fell
19 down the hole that they created.

20 It's your opinion that he stumbled or tripped or
21 some other way he fell down the hole that they created?

22 A. The testimony that I reviewed referred to
23 certain things that could be heard that are more
24 consistent with a trip. And there actually are things
25 there under those circumstances that would be a trip

JOYCE A. WISE, RMR, (717) 299-8091

1 hazard.

2 Q. And do you --

3 A. So a trip hazard adjacent to a hole, combined
4 with the sounds that were heard, it's consistent with it
5 having been a trip and falling into the hole.

6 Q. And what sounds or things are you talking about?

7 A. There's a reference to a stomping sound. I'd
8 have to look to see which witness it was. But it was the
9 gentleman who was working nearby.

10 Q. Okay. Anything else?

11 A. That's the only one offhand.

12 Q. Did anyone see him fall through the hole?

13 A. I'm not recalling anybody that actually saw the
14 initial movement that went that direction. I believe
15 there were some that saw the -- after he was already in
16 the hole and moving downward.

17 Q. You also reviewed the South Carolina OSHA
18 report?

19 A. Yes, I did.

20 Q. And they found that Boeing did not violate any
21 OSHA standards as a result of this incident, correct?

22 A. That is my recollection.

23 Q. Okay. Did you find any fault with that?

24 A. No, I did not.

25 Q. Okay. Sorry. I've had a cold for a week, like

JOYCE A. WISE, RMR, (717) 299-8091

1 everybody else.

2 A. Are you finding everything you need there?

3 Q. Yes. I just need some water.

4 And you also reviewed the deposition of Michael
5 Ellison, correct?

6 A. Yes, I did.

7 Q. Did you make any comments about that?

8 Do you make any notes about the review of his
9 deposition?

10 A. I created a summary of that.

11 Q. Could I see that?

12 A. I don't have it printed, but it was given to you
13 through electronic media.

14 Q. I saw that. Is that all you're talking about?

15 A. That is what I'm referring to, if you saw that
16 word document.

17 Q. You made no handwritten notes on the deposition
18 itself or other handwritten notes?

19 A. I reviewed that electronic version and I created
20 that word document.

21 Q. And you reviewed the deposition of Walter
22 Converse?

23 A. Yes, I did.

24 Q. And the same thing, all you have is your notes,
25 electronic notes on your review of that deposition,

JOYCE A. WISE, RMR, (717) 299-8091

1 nothing else?

2 A. That's correct.

3 Q. Who is Les Winter?

4 A. Les Winter's an electrical engineer in our firm.

5 Q. Did he work with you on this report?

6 A. He peer reviewed it.

7 Q. How about John Green?

8 A. John Green is a mechanical engineer in our firm.

9 Q. Did he work with you on this report?

10 A. No, not on my aspects.

11 Q. Who else worked with you on this report?

12 A. I would have interacted a bit with Peter Coste.

13 Q. Right. That's it?

14 We have a Carrie O'Donel in the bill and a Lois

15 Nace on the bill.

16 Did you work with either of them?

17 A. Not with Carrie. Lois is our librarian and

18 occasionally work with her and I may have on this matter.

19 Q. She would have just supplied you with

20 information, would not have done any work on the actual

21 project?

22 A. That's correct.

23 Q. What work did Peter Coste do on the issue?

24 A. Well, I think he -- he had a look at the report

25 as I was working on it. He had given me background

JOYCE A. WISE, RMR, (717) 299-8091

1 information as I was beginning. I believe that would be

2 the extent.

3 Q. I've been given to understand that you all do

4 not keep records and notes as to what work was being done

5 at the time it was being performed by you. You just get

6 an entry from the bill, is that correct?

7 A. Well, of course, what we do is we record our

8 time in an electronic application that records that.

9 There are times that, you know, where notes

10 would be taken and stored as part of the file and there

11 actually is a page in my file that was scanned and

12 produced.

13 Q. Okay. And that's all the notes you have in this

14 case, is that right?

15 A. That's the only handwritten note, I would say.

16 Of course, the transcript summaries I would say

17 are notes. They're just electronic form.

18 Q. Now, let me hand you -- make it easier -- of the

19 timeline prepared by your company.

20 If you would turn to Page 34 of that on the

21 bottom -- it's actually Page 2 of the timeline -- if you

22 look down at November 23rd, 2012.

23 A. I see that.

24 Q. All right. And the report says, Futuramic

25 finished all mechanical assembly of platform, correct?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. That's correct.

2 Q. What was the intended use of the platform at

3 that time?

4 A. At around that point in time, my understanding

5 is that the equipment had been --

6 Q. You can answer the question you want to.

7 What was the intended use of the platform at

8 that time?

9 A. Well, at that time it was still being prepared

10 for use.

11 Q. What was the intended use of the platform at

12 that time?

13 MR. ROZELSKY: Object to the form.

14 THE WITNESS: It was being used by SAR to work

15 on their commissioning as it goes into the 24th.

16 BY MR. WALL:

17 Q. I'm asking what was the intended use of cell 90

18 platform at the Boeing plant on November 23rd when

19 Futuramic finished all their work?

20 MR. DEAN: Object to the form.

21 MR. ROZELSKY: Object to the form.

22 THE WITNESS: Well, there was -- there was a

23 state of completion at that point. Certainly there

24 were -- everybody was working to a project that was to

25 deliver a work platform to be used that was still in

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1 process.

2 BY MR. WALL:

3 Q. Do you know what the intended use of the

4 platform was when it was delivered to Boeing?

5 A. Well, there's the intended use --

6 Q. That's my sole question. What's the intended

7 use?

8 A. That everybody is working towards --

9 Q. What was the intended use of that platform when

10 delivered to Boeing in November of 2012?

11 MR. ROZELSKY: Object to the form.

12 THE WITNESS: The intended use to eventually

13 make it something they could use in production as a work

14 platform.

15 BY MR. WALL:

16 Q. Doing what?

17 A. For composite fabrication.

18 Q. And what was the intended use of that platform?

19 MR. ROZELSKY: Object to the form.

20 THE WITNESS: To eventually get it to the point

21 where it could be used for composite fabrication.

22 BY MR. WALL:

23 Q. Was it to have a platform for the employees to

24 walk on, extend the sliders so that they could get close

25 to the composite body of the aircraft?

JOYCE A. WISE, RMR, (717) 299-8091

1 MR. ROZELSKY: Object to the form.
2 THE WITNESS: The purpose was to complete a
3 system eventually that would provide a work platform along
4 the fuselage of the airplanes they were building.
5 BY MR. WALL:
6 Q. So you don't know what the intended use of it
7 was? Is that what you're telling me?
8 MR. DEAN: Object to the form of the question.
9 THE WITNESS: Was to create a work platform --
10 if you want more details, just ask me.
11 BY MR. WALL:
12 Q. What was not there on November 23rd as to its
13 intended use as a working platform?
14 A. What was not there was a commissioned control
15 system -- I'd like to finish my answer --
16 Q. Sure.
17 A. -- that included all the necessary things to
18 make this a safe work platform. Necessary to be completed
19 still was commissioning, testing, verification programming
20 to make it a complete system.
21 Q. What was not there on the platform that
22 prevented it from being used to roll up to a section of
23 the body, send out the sliders, and work on the platform
24 of cell 90? What was not there?
25 A. Commissioning had not been done in a way that

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1 completed the software and control and verification to
2 make it a safe system.
3 Q. What was not there about the software?
4 A. The design included what would complete
5 verification of communications, an alarm system and
6 prevention of the system from continuing.
7 And by SAR injecting themselves as the
8 commissioner, they did not complete the design -- they did
9 not complete it to its design.
10 Q. What was not there about the PLC for the
11 controls and the alarm system when Intec and Futuramic
12 delivered it to Boeing?
13 A. What was not there was the steps that are
14 necessary when machinery is commissioned to complete it to
15 its design.
16 Q. So you're telling me, correct me if I'm wrong,
17 that because Boeing has this need to have redundant
18 brakes, that machine could not have functioned at Boeing
19 starting November 23rd, 2012, when Futuramic delivered it
20 to Boeing?
21 MR. DOWLING: Object to the form.
22 THE WITNESS: In order to complete it to its
23 design, there were still things that were necessary.
24 I'd like to finish.
25 By SAR injecting themselves as the commissioner

JOYCE A. WISE, RMR, (717) 299-8091

1 and then not completing it to its design, SAR effectively
2 removed things from the design.
3 BY MR. WALL:
4 Q. What was not there on November 23rd that
5 prevented it from operating as fully intended by Futuramic
6 and Intec?
7 A. What was not there was the commissioning that
8 was necessary.
9 Q. I'm talking about -- not commissioning. I'm
10 talking about physical properties, electronic properties,
11 mechanical properties that were not there?
12 MR. ROZELSKY: Object to the form.
13 THE WITNESS: There was software and hardware
14 that was still awaiting completion.
15 BY MR. WALL:
16 Q. What software?
17 A. There was software for making up a complete
18 control and alarm system that would allow it to meet
19 reasonable standards.
20 With SAR injecting themselves as the
21 commissioner and then not doing the work that was needed
22 to be done during the commissioning, SAR effectively
23 removed things from the design.
24 Q. Who told you that the alarm system was not fully
25 set up when the machine was delivered to Boeing?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. The testimony and the evidence shows that there
2 were details to be done as part of the commissioning, like
3 is customary in machinery, manufacturing and commissioning
4 there were those details that were -- needed to be
5 completed.
6 Q. Name one. Name a detail that was not there in
7 the PLC or the mechanical setup of cell 90 when it was
8 delivered to Boeing on November 23rd?
9 A. Well, I'll start with what I identified in my
10 report as Rung 47 of the Slider to Ladder Program -- Slide
11 to Ladder Program.
12 Q. What's that?
13 A. It's the sub routine where the elements for
14 communication detection and verification were in place
15 with a placeholder, as I've identified in my report, for
16 the design to be completed as will be done in the field to
17 test and verify that programming which is in place to
18 provide for this detection.
19 Q. And that was already put in place by Intec and
20 Futuramic, correct?
21 MR. ROZELSKY: Object to the form.
22 THE WITNESS: That was in place by Intec
23 specifically, with the need for its completion,
24 verification and testing.
25

JOYCE A. WISE, RMR, (717) 299-8091

1 BY MR. WALL:
2 Q. And that was done by Futuramic when it delivered
3 the machine to Boeing, correct?
4 MR. DEAN: Object to the form of the question.
5 THE WITNESS: It was specifically done as a
6 piece of machinery manufacturing when the equipment was on
7 the test floor in preparation for software continuation
8 and completion.
9 During commissioning, SAR injected themselves as
10 the commissioner and then effectively removed things from
11 the design.
12 BY MR. WALL:
13 Q. What did SAR -- I call it S-A-R -- remove from
14 the design?
15 A. SAR removed from the design communication loss
16 detection.
17 Q. How did it do that?
18 It's still there, correct?
19 A. SAR did not complete it to its design.
20 To complete it to its design -- they stepped in
21 as the commissioner and then they effectively changed the
22 design by not completing it to its design.
23 Q. And SAR had nothing to do with the design,
24 correct?
25 MR. ROZELSKY: Object to the form.

JOYCE A. WISE, RMR, (717) 299-8091

1 BY MR. WALL:
2 Q. SAR did not design this equipment, did it?
3 MR. DOWLING: Object to the form.
4 THE WITNESS: SAR modified the design.
5 BY MR. WALL:
6 Q. We're gonna get into that.
7 A. SAR effectively removed from the design --
8 Q. Can you answer my question?
9 A. I am answering your question.
10 Q. No.
11 My question is very simple. Did SAR, S-A-R,
12 design this machine?
13 A. Yes. When they injected themselves as a
14 re-manufacturer as part of commissioning it, they became a
15 designer. And then they proceeded to change the design by
16 removing certain aspects that they did not complete as was
17 designed.
18 Q. SAR was contracted with Boeing to put on
19 redundant brakes, correct?
20 A. That was part of it.
21 Q. And that's the only contract we have, isn't it?
22 A. SAR --
23 MR. DOWLING: Object to the form.
24 THE WITNESS: -- proposed to do an alarm horn
25 and to work with the manufacturer for slide control.

JOYCE A. WISE, RMR, (717) 299-8091

1 They proposed to do these things. Then they put
2 themselves at the commissioning site with full knowledge
3 that they were the ones that were the programmer on-site.
4 And anybody who knows anything about equipment
5 manufacturing, such as this, knows that that machine, when
6 it came in the door, was not ready for use until it was
7 commissioned.
8 Anybody who has any basic knowledge of
9 machinery.
10 BY MR. WALL:
11 Q. And Boeing accepted the machine from Futuramic
12 on November 23rd, correct?
13 A. I'm not aware of something that states it in
14 that form.
15 Q. Okay. And then Boeing, taking possession of the
16 machine, directed its contractor, SAR, to begin work on
17 the redundant brake system, correct, on November 24th?
18 A. My understanding is there was communication
19 between Boeing and SAR about certain aspects of things
20 that Boeing wanted included.
21 Nevertheless, it is necessary for SAR not to
22 re-modify -- not to modify, not to remove and change the
23 design as an equipment manufacturer the need to deliver a
24 product, which includes the commissioning to meet
25 reasonable safety standards.

JOYCE A. WISE, RMR, (717) 299-8091

1 SAR injected themselves and then failed to
2 complete the design -- injected themselves as the
3 commissioner and they did not complete the necessary steps
4 to make it a safe control system.
5 Q. Do you know why Boeing wanted redundant brakes
6 on this machine?
7 A. Boeing wanted braking systems that were more
8 similar to what they had on other cells.
9 Q. And Boeing required redundant braking systems on
10 all equipment, correct?
11 A. My understanding is that they were -- they were
12 matching the design for that piece of it relative to other
13 cells.
14 Q. The cell already had a braking system on it.
15 This was a redundant braking system, means a secondary
16 braking system?
17 A. Yes, that's my understanding.
18 Q. What did the braking system do to assist cell 90
19 in its intended purpose of picking men up to the level of
20 20 feet off the ground to work on the body of the
21 airplane?
22 A. Well, SAR modified --
23 Q. Answer my question. And then you can say
24 anything you want to.
25 What did the redundant braking system do to the

JOYCE A. WISE, RMR, (717) 299-8091

1 intended purpose of the machine?
2 A. Well, it removed a very specific safety aspect.
3 Q. What did the redundant braking system add to the
4 machine cell 90 to let it perform its intended purpose?
5 MR. DEAN: Object to the question. Asked and
6 answer.
7 THE WITNESS: I want to be clear, are you
8 referring now just to the braking aspect --
9 BY MR. WALL:
10 Q. Correct.
11 A. Or the work generally that they did?
12 Q. All they did was -- the braking aspect.
13 What did the braking aspect have to do to add to
14 the intended use of the machine?
15 A. Well, their intent was to provide a brake to
16 hold the slider positions.
17 Q. Right. A secondary brake?
18 A. Yes.
19 Q. Did that have anything to do with the intended
20 purpose of the machine, which is getting men 20 feet in
21 the air to work on the fabrication of the machine, of the
22 airplane?
23 MR. DEAN: Object to the form of the question.
24 THE WITNESS: Well, I would say that, you know,
25 there's getting them up there and then there's getting the

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1 sliders into position.
2 And that they certainly were relative to holding
3 the sliders into position.
4 Q. They were redundant. So they weren't used
5 unless there was a problem and there was no problem at
6 this point in time, correct?
7 MR. DEAN: Object.
8 THE WITNESS: That kind of mischaracterizes what
9 they are.
10 They hold the slider. And so it's not like they
11 wait there and see if something else is holding it and
12 then they hold it.
13 They held it at the brake. It engages and
14 disengages.
15 BY MR. WALL:
16 Q. Did it have anything to do with having them
17 20 feet in the air working on the side of an airplane?
18 A. Well, it had to do with holding the sliders in
19 position.
20 Q. That's it?
21 A. That part of what they did is what, you know,
22 that was the extent of that.
23 The other work they did removed other safety
24 aspects.
25 Q. We'll get into that later.

JOYCE A. WISE, RMR, (717) 299-8091

1 So you will agree with me that the redundant
2 brakes had nothing to do with the intended purpose of cell
3 90?
4 MR. DEAN: Object to the form of the question.
5 Calls for --
6 THE WITNESS: No, I don't agree with that. It's
7 part of holding the slider into position.
8 BY MR. WALL:
9 Q. Did the sliders ever move out of position as far
10 as you are aware?
11 A. If you're referring to whether the brakes
12 disengaged and allowed movement when it shouldn't have,
13 I'm not aware of anything like that.
14 Q. Okay. What did the redundant brakes do to cause
15 Slider Number 2 not to extend on March 18th?
16 A. Okay. Are we now referring to the brakes or the
17 logic changes that were made?
18 Q. I'm talking about brakes. All -- I'm talking
19 about the brakes.
20 A. Okay. Well, I'm just gonna keep reminding you
21 that they did more than --
22 Q. No, they didn't. That's another -- we don't
23 need to argue about that.
24 We'll talk about that later.
25 A. Well, I need to clarify that they did.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. Well, doesn't matter.
2 What do the brakes have to do with causing
3 slider Number 2 not to extend?
4 A. The brakes were -- that were being added were
5 intended to release when the motors would run and engage
6 when the motors would stop.
7 Q. What did slider -- what did the redundant brakes
8 do to cause slider Number 2 not to fully extend on
9 March 18th?
10 A. The logic changes that they made affected the
11 control system. And there were parts of that that
12 controlled the brakes. And that part worked to hold the
13 brakes when the motor was not turning.
14 However, they did more than that. And it
15 removed safety aspects. And their work did not include
16 the commissioning to the design of the system.
17 Q. What caused slider Number 2 not to come out on
18 March 18th? Was it mechanical or electrical?
19 A. It was caused by a communication loss.
20 Q. Was it mechanical or electrical?
21 A. It was electrical or part of the electrical
22 system.
23 Q. What in the electrical system did not function
24 properly to prevent slider Number 2 from coming out on
25 March 18th?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. The bit for starting the drive did not
2 effectively communicate to the drive and the system
3 design, which included communication loss, detection had
4 been effectively removed by the work that SAR had done,
5 such that it allowed the system to continue further.

6 There were manual changes that were made by SAR
7 that allowed sliders to continue while one would not
8 continue.

9 And, again, not having completed it to the
10 design, this allowed for sliders to go out and create a
11 partial work surface with a hole where slider 2 should
12 have been.

13 Q. You're aware that Intec was down in Boeing
14 between March 26th and April 1 and found nothing improper
15 about the PLC, correct?

16 MR. DEAN: I object to the form of the question.

17 THE WITNESS: My understanding is that they
18 attempted to replicate the problem and they did not manage
19 to do that.

20 However, there was a precedent occurrence. And
21 regardless, communication loss can occur. The system was
22 designed to include it.

23 By SAR's actions, they effectively removed that
24 from the design.

25

JOYCE A. WISE, RMR, (717) 299-8091

1 BY MR. WALL:

2 Q. Did Intec find anything wrong with the
3 electrical system when they went down and inspected the
4 PLC after the incident?

5 A. No, it was working properly.

6 There was no issue with communication at the
7 times that they were looking at it. That's my
8 understanding.

9 Q. And did they find that all the alarms were still
10 functioning properly?

11 MR. DEAN: Object to the form of the question.

12 BY MR. WALL:

13 Q. Did they?

14 A. They found that there was -- as far as -- I
15 guess I'll ask you to be more specific.

16 Q. Did they test the alarm system and find out that
17 it was still working as installed?

18 A. My understanding is that they verified that an
19 alarm could be generated and it would be recorded.

20 Q. Did they find that in their opinion a human body
21 somehow pushed the wrong button and caused slider Number 2
22 not to extend properly?

23 MR. DEAN: Object to the form of the question.

24 THE WITNESS: Yes. But the evidence shows
25 otherwise.

JOYCE A. WISE, RMR, (717) 299-8091

1 The evidence and testimony is different from
2 that.

3 BY MR. WALL:

4 Q. But that's what they found?

5 A. I believe so.

6 Q. And that's what Boeing found when it tested,
7 right?

8 A. I guess -- are we referring to the examination
9 at the time when they went up right after the incident?
10 Or are we talking about the month of testing that occurred
11 after that?

12 Q. The week of testing that occurred after that.

13 A. Well, they initially looked to see -- and they
14 found slider 2 disabled. I guess I want you to be clear
15 on what it is that you are asking.

16 Q. Slider Number 2 was not extended when they took
17 the machine out of work on March 18th, correct?
18 March 18th, the day of the incident.

19 A. Yes.

20 Q. They then went back and attempted to start it up
21 and they got slider 2 to work properly.

22 A. After they reset things.

23 Q. And they -- and they reset it, because someone
24 had flipped a switch, a human being had flipped the
25 switch?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. No, that's not correct.

2 Q. Okay. Who flipped the switch then?

3 A. Well, they did reset it. But they first
4 identified that it was -- had a double flashing green and
5 they further identified the circumstances that could lead
6 to the double flashing green on the drive.

7 Q. And Futuramic and Intec and Boeing, doing their
8 investigation, found nothing wrong with slider Number 2,
9 correct?

10 A. They could not replicate the problem, but they
11 continued to test the Profibus network communications for
12 weeks or months after that in their attempt to replicate
13 the problem or determine the cause of the problem.

14 Q. Now, the machine basically went in service on or
15 about November 26th, correct? Or 28th?

16 A. My understanding is that that was -- is that
17 that's approximately when they started to use it or were
18 prepared to use it in production.

19 Q. Correct.

20 And from then, no one ever found anything wrong
21 with slider Number 2, isn't that correct?

22 A. That's not correct, because it was identified
23 that it had double flashing green.

24 Q. No one found anything wrong with slider Number
25 2, isn't that correct?

JOYCE A. WISE, RMR, (717) 299-8091

1 MR. DEAN: Object to the form of the question.
2 THE WITNESS: Boeing identified in their report
3 what could cause that. And what they identified included
4 communication loss.

5 BY MR. WALL:

6 Q. Now, at one time around -- in January someone
7 sent a -- filled out a -- filled out an incident report
8 where Slider Number 2 did not work, correct?

9 A. I was seeing whether I could verify the date you
10 mentioned, but maybe you're looking at a document.
11 Which date did you say?

12 Q. I think it was sometime in December they turned
13 in their work orders for Slider Number 2.

14 A. You may be referring to January 24, 2013.

15 Q. That's what I'm referring to.

16 A. It had to be Boeing 239 and 240, if that helps
17 you.

18 Q. That's correct. Yep. Supposed to be in here
19 someplace.

20 So Slider Number 2 they found out wasn't working
21 one time and they had it fixed.

22 Do you know what caused it not to function that
23 time, was it mechanical or electrical?

24 A. The description that is provided in the write-up
25 is consistent with it being the same circumstance that

JOYCE A. WISE, RMR, (717) 299-8091

1 occurred at the time of this incident.

2 Q. Was it mechanical or electrical?

3 A. Description is consistent with it being
4 electrical.

5 Q. And they went and checked it and fixed it,
6 correct?

7 A. Yes, they did.

8 Q. And they put the machine back in service?

9 A. That's correct.

10 Q. And they had no further problem with it?

11 A. That's correct. Well, they didn't have a
12 problem with it immediately, if you mean -- of course, we
13 had a huge problem on March 18th, 2013.

14 Q. And so from going into service on
15 November 30th until January had no problem with any
16 sliders, correct?

17 A. None that are that specific.

18 Actually the testimony is there were more times
19 and the guys would try different things. But if you're
20 talking about documented incidents on Slider 2 --

21 Q. Right. That's the only one.

22 And then had a problem on March 18th?

23 A. That's correct.

24 Q. But it worked perfectly fine all the other
25 times?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. The documents -- the descriptions are that they
2 had slider issues at times, but as far as service records
3 that's the one I'm aware of.

4 Q. That's all anecdotal, correct?

5 The complaints of any sliders was all anecdotal.
6 The only reported ones are the two we are talking about.
7 One in January and one in March.

8 A. For Slider 2 that I'm aware of.

9 Q. And they're all checked out. And no one could
10 find anything wrong with Slider Number 2, correct?

11 A. They were unable to replicate the problem, which
12 by the way is consistent with the way your communications
13 could have had a communication loss.

14 Q. Now, on or about December 4th, Boeing found out
15 that the lasers on the ends of sliders was not picking up
16 the material and, therefore, cutting down the movement of
17 the sliders, correct?

18 A. I don't know the exact dates, but in and around
19 about that time.

20 Q. Exhibit Number 76. You can look on the
21 timeline.

22 A. Yes, that's the way it's reported.

23 Q. Do you know why the lasers installed by Intec
24 were not working properly?

25 A. Well, my understanding is that the nature of the

JOYCE A. WISE, RMR, (717) 299-8091

1 sensors was having difficulty with the target it was
2 intended to sense.

3 Q. And what did Boeing decide to do about that
4 problem?

5 A. My understanding is there was communication
6 between Boeing and SAR for defeating the sensors.

7 Q. Why did Boeing want to do that?

8 A. My understanding is that they were having
9 trouble with cycles completing and extending.

10 There were issues with the stop locations. And
11 so they requested help from SAR. And SAR defeated them
12 without taking any further action to correct the problem.

13 They actually -- what actually should have
14 occurred as part of proper commissioning would have been
15 to test and verify. And in the event that they could not
16 be used successfully, should have resulted in them
17 promptly working to a solution that would provide safety
18 for the operators.

19 Q. And do you know whether or not Boeing contacted
20 Futuramic and Intec about the problem; that is, the
21 sensors not working?

22 A. Your question is if who contacted who?

23 Q. Boeing contacted either Futuramic or Intec about
24 the sensors not working?

25 A. I believe they did. I'm not certain exactly how

JOYCE A. WISE, RMR, (717) 299-8091

1 that communication went.
2 Q. And do you know whether Intec came up with a
3 sensor that did work?
4 A. My understanding is that as of now there are
5 different sensors.
6 Q. Do you know how long it took Intec to be able to
7 install the new sensors?
8 A. Not offhand I don't.
9 Q. If the timeline shows that on December 4th,
10 Futuramic was informed of the problem of the sensors and
11 that on April 26th, replacement sliders -- or sensors were
12 installed, that's about five months, correct?
13 A. A little less than that between those two points
14 on this timeline --
15 Q. Okay.
16 A. -- as identified.
17 Q. And so it's your position that Boeing should
18 have taken cell number 90 out of service for that period
19 of time?
20 A. What was necessary was to --
21 Q. You can say all you want to. Can you answer my
22 question? And then say whatever you want to say.
23 A. Well, I was going to say, no. But it was
24 necessary to come up with a workable -- a safe
25 work-around.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. And Boeing's safe work-around was to disconnect
2 or blind the sensor, correct?
3 A. SAR acted to disable and leave the situation in
4 place.
5 Q. Who commissioned SAR to do that work?
6 A. There was communication between Boeing and SAR
7 when SAR did those actions.
8 Q. So Boeing told SAR to disconnect the sensors,
9 correct?
10 A. Boeing and SAR had a discussion and SAR acted to
11 do it.
12 SAR, as a re-manufacturer, should have advised
13 Boeing of any safety ramifications for all of the changes
14 they were making, which at this point included making the
15 system manual, not completing the commissioning to the
16 design, not completing the alarm system in a way that
17 would prevent what happened to Mr. Priester.
18 Q. Who made the system mechanical?
19 I mean -- yeah. Is that what you said?
20 A. I'm gonna ask you to repeat the question.
21 Q. Yeah. Who made the system manual? Who made the
22 system manual?
23 A. SAR.
24 Q. Intec, when they built the machine, didn't they?
25 MR. DOWLING: Object to the form.

JOYCE A. WISE, RMR, (717) 299-8091

1 THE WITNESS: Intec provided limited manual
2 ability for the intentional of use by maintenance
3 personnel.
4 BY MR. WALL:
5 Q. Let me show you Exhibit Number 82.
6 Have you seen that?
7 A. Yes, I've seen this.
8 Q. And that -- what that says is that Intec did not
9 want the system to be individualized manually, but that
10 Boeing insisted that it be done that way, correct?
11 A. Boeing was requesting that. That's what is
12 identified here.
13 Q. And that's what was done?
14 A. And SAR had a responsibility to advise Boeing of
15 the safety ramifications.
16 SAR, as the re-manufacturer of the equipment,
17 stood in the position of -- they took on the
18 responsibility. They should have been -- to take on these
19 responsibilities, should have been familiar with safety
20 standards to advise Boeing of potential safety
21 ramifications.
22 Q. And how many safety engineers does SAR have?
23 A. How many safety engineers does SAR have?
24 Q. Yes.
25 A. Offhand I don't know.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. How many mechanical engineers does SAR have?
2 A. I'm not sure.
3 Q. How many engineers does SAR have?
4 A. I'm not sure.
5 Q. How many safety engineers does Boeing have?
6 A. I'm not sure.
7 Q. More than one?
8 A. Probably do. They have a very high concern for
9 safety, particularly with the design of aircraft.
10 Q. And how many engineers does Boeing have? And
11 not aeronautical engineers, but just general PES.
12 A. Offhand I don't know.
13 But they turned over the design and manufacture
14 of this system to somebody that they should reasonably be
15 able to expect to have more knowledge and time to spend on
16 the aspects, including the safety aspects for a mobile
17 work platform system.
18 Q. Have you seen a contract between SAR and Boeing
19 as to disabling the lasers?
20 A. Well, that one document included invoices and a
21 contract. I guess you're asking if it's in the contract
22 portion?
23 Q. Of the lasers. Not the redundant brakes. Of
24 the lasers?
25 A. I'd have to check.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. All right. I suggest to you, there's not one.
 2 A. Okay.
 3 Q. You read Mr. Converse's deposition?
 4 A. Yes, I did.
 5 Q. Did you see where he says -- he had this
 6 problem. SAR was already in the plant doing some stuff.
 7 And I asked them to disconnect the lasers.
 8 A. Yes. I know that he had communication. I don't
 9 remember the precise language.
 10 Q. Do you know anything else about how SAR got
 11 involved in disconnecting the lasers other than the
 12 testimony of Ellison and the testimony of Converse?
 13 A. Not offhand I don't.
 14 Q. So both that testimony tells, all we were asked
 15 to do was to disconnect the laser, because they needed
 16 that platform 90 working during this period of time that
 17 Intec was coming up with the fix.
 18 That's all the information we have, correct?
 19 A. I'm not aware of others that would relate to
 20 that sequence, but certainly SAR had a responsibility to
 21 identify the safety ramifications of any modifications
 22 they made to the system, as well as anything that they did
 23 not include completing it to its original design.
 24 Q. Do you know how much a 787 costs to buy?
 25 A. Not offhand I don't.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. About \$250 million.
 2 Do you know how much it costs today to assemble
 3 the 787? Not to buy, just to assemble it.
 4 A. No, I don't.
 5 Q. Around 300 million.
 6 Have you read in the paper where the IRS may be
 7 going after Boeing over their accounting practices,
 8 because they moved expenses back and forth over blocks of
 9 sales to actually show generating a profit on the early
 10 planes, when they're not actually gonna make a profit for
 11 another year and a half or two years?
 12 Have you been reading that in the paper?
 13 A. I've seen that. I've only seen parts of it.
 14 Q. Okay. And it's your opinion that Boeing should
 15 have quit making five airplanes a day -- excuse me, five
 16 airplanes a week in Charleston because the sensors on cell
 17 number 90 were not working?
 18 Is that your testimony?
 19 A. No.
 20 What needed to be done was a work-around. And
 21 certainly SAR had the responsibility to advise of the
 22 safety ramifications of the various modifications and the
 23 various failures to complete this system to its design.
 24 Q. What if SAR can't do that?
 25 What if SAR doesn't have the technical ability

JOYCE A. WISE, RMR, (717) 299-8091

1 to do that? All SAR can do is go in and block the sensor.
 2 A. SAR, as taking a position and making a quotation
 3 for doing the things that they proposed to do, should have
 4 not -- if they don't have the knowledge to do the job,
 5 frankly they should not be offering to do it.
 6 Q. Where is the quotation to disconnect the sensor?
 7 A. The quotation refers to the slider control and
 8 the slider control includes sensors and the various
 9 aspects of slider control.
 10 Q. That was for the braking system. I want to know
 11 where the quote was for disconnecting the sensors?
 12 A. Sir, you're mischaracterizing the quotation.
 13 And if you'd like, I can read it again.
 14 Q. Sure.
 15 A. But it actually refers to the sliders.
 16 Q. I understand. And that's the work done for the
 17 brakes.
 18 A. It absolutely goes beyond that, sir.
 19 Work with platform general supplier in order to
 20 implement logic for slider operation. And that it goes
 21 far beyond brakes.
 22 Q. Okay. You'll agree with me that in projects,
 23 SAR did two projects, one was redundant brakes and the
 24 other was to disconnect the sensors.
 25 Did they do any other project at Boeing's

JOYCE A. WISE, RMR, (717) 299-8091

1 request?
 2 A. Well, there's a lot of things they didn't do
 3 well.
 4 But their project included commissioning,
 5 working with the supplier to implement slider logic.
 6 There are many things they did not complete to
 7 the design. They did the manual conversion, for example,
 8 which --
 9 Q. I thought we just agreed that they didn't do it,
 10 that Intec did it, at Boeing's request?
 11 MR. DOWLING: Object to the form.
 12 THE WITNESS: My understanding of what is
 13 written here is what Mr. Naz is referring to -- Naz,
 14 N-A-Z -- what he is referring to is a modification by
 15 somebody other than Intec.
 16 BY MR. WALL:
 17 Q. Okay. What should, in your parlance, SAR have
 18 done when it disconnected the sensor?
 19 A. What should have been done was an exhaustive
 20 effort to verify what the issue is with the sensors.
 21 Identify what would work if those could not be made to
 22 work. Identify what it was that was triggering them to
 23 stop at the wrong location.
 24 And do a technical evaluation of what would be a
 25 solution that would leave a work platform for people that

JOYCE A. WISE, RMR, (717) 299-8091

1 they could safely use and in a timely manner.
2 Q. You're of the opinion that the sensor was
3 causing the slider to stop short?
4 A. That was some of it.
5 Q. I thought everyone agreed that the sensor was
6 not picking up the material; therefore, the sensor was not
7 causing the slide to stop?
8 A. I believe that was --
9 Q. And it was actually hitting the material?
10 A. That was also described.
11 Q. Do you know of any document that says the
12 sensors were causing the slide to stop short?
13 A. I believe there was testimony to that effect.
14 Q. From whom?
15 A. If I could take a moment and review?
16 Q. Sure.
17 MR. DOWLING: Take a short brake and run to the
18 restroom.
19 (Recess.)
20 BY MR. WALL:
21 Q. Did you find --
22 A. Yes, I did.
23 Mr. Ellison described at Pages 125, 128 and
24 again at 190, there may be others, but that's one --
25 that's what I found.

JOYCE A. WISE, RMR, (717) 299-8091

1 (Deposition Exh. No. 101 marked.)
2 BY MR. WALL:
3 Q. Okay. Let me hand you what I've marked as
4 Exhibit Number 101, which Intec billed to Futuramic.
5 Have you seen that before?
6 A. Yes, I believe I have.
7 Q. That is the bill to redesign the lasers,
8 correct?
9 A. It includes laser sensors.
10 Q. Right.
11 Do you know of any other statement by Intec of
12 the change-out of the laser other than that?
13 A. Well, I believe there may be other documents at
14 this time, but I believe they would go with that one.
15 Q. Going back a little bit.
16 You stated that SAR installed some hardware.
17 Other than the redundant brakes, what other hardware did
18 SAR install?
19 A. No. Actually what I said was there were things
20 to complete the design that included software and
21 potentially hardware.
22 Q. Did they do any hardware work?
23 A. Well, they did hardware work that was relative
24 to the brakes.
25 Q. Any other?

JOYCE A. WISE, RMR, (717) 299-8091

1 A. I'm not aware of any other.
2 Q. Okay. All right. Now, when the laser was
3 disconnected, which allowed Boeing to continue to use cell
4 90, on or about -- sometime in January of '12, did any of
5 the sliders fail to extend properly to their full length?
6 A. During what time frame?
7 Q. From -- let's assume that these lasers were
8 disconnected around February 5th -- excuse me, December
9 5th or 6th of '12.
10 Did the sliders ever fail to fully extend when
11 requested after SAR removed the sensors on the end of the
12 sliders?
13 A. Well, sure -- we've identified Slider 2 did in
14 January and again in March.
15 Q. Twice. Any other times?
16 A. Those are the two that I believe that have been
17 documented.
18 Q. Okay. And we already discussed the fact that
19 they, Boeing, went in and checked Slider Number 2 in
20 January and found nothing wrong with, it correct?
21 A. Well, they managed to get it working again. I
22 wouldn't say they didn't find anything wrong. It didn't
23 work.
24 They had to -- they had to get it -- they had to
25 do some action to get it working again.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. They put the machine back in service?
2 A. They did get it to move and then put it back in
3 service.
4 Q. And nothing again happened to any of the sliders
5 that is documented until March 18th, correct?
6 A. I'd have to check if there were other ones. And
7 certainly there's testimony that the sliders gave them
8 trouble.
9 Q. The anecdotal testimony of the workers?
10 A. If you're calling it anecdotal. But testimony,
11 yes.
12 Q. Right. Well, anecdotal means it's not
13 documented anywhere, correct?
14 A. I guess there could be some that are and some
15 that are just described. But, yes, there would be at
16 least some that were just anecdotal.
17 Q. Did the removal of the sensors, the laser
18 sensors, cause Slider Number 2 not to fully extend on
19 March 18th, 2012?
20 A. No.
21 Q. All right. Let me look at my notes and -- well,
22 let me ask this last question.
23 Do you have any opinions about the work of SAR
24 which is not set forth in your written report?
25 A. Well, I think that it's a good summary. You

JOYCE A. WISE, RMR, (717) 299-8091

1 know, there certainly would be things relative to those,
2 but I think it's a pretty good summary.
3 Q. Those are your opinions, correct?
4 A. Yes, they are.
5 Q. And did you read the deposition of Mr. Eckhardt?
6 A. Yes, I did.
7 Q. Did anything he say change any of your opinions
8 as set forth in your report?
9 A. No, it did not.
10 Q. He deferred to you on a couple occasions.
11 Have we covered with you all the issues that he
12 deferred to you on?
13 A. Well, I believe probably. I believe. I have
14 not gone through it like a checklist, but probably.
15 Q. And you are aware and had read all the testimony
16 that every worker on that platform that evening was fully
17 aware that Boeing's rules were if one of the sliders did
18 not work or anything malfunctioned on that cell 90, you
19 were supposed to cease work immediately, tag the machine
20 out and call maintenance, correct?
21 MR. DEAN: Object to the form of the question.
22 THE WITNESS: I'd have to verify.
23 You threw a couple points in there as far as
24 what all they knew, and you have different individuals.
25 Of course, we'll never have Mr. Priester be able
JOYCE A. WISE, RMR, (717) 299-8091

1 certain measures to be taken.
2 Q. So you think it's a bad policy --
3 A. I didn't say that.
4 Q. -- for Boeing to require their employees to stop
5 working if something is not working properly?
6 A. I didn't say that.
7 Your question was about a very general thing.
8 And now if you want to refer more specifically, you know,
9 I'd be happy to look at that.
10 I guess what I was offering was that situations
11 vary and it needs to be considered.
12 Certainly it needs to be considered and safe
13 measures need to be taken.
14 Q. Do you know whose idea it was to have only one
15 valve on the redundant braking system as opposed to 18
16 valves?
17 A. Well, I'd need to verify. I think it might have
18 been Mr. Converse, but I'd like to verify.
19 Q. So Boeing -- that was Boeing's decision?
20 A. Yes. That's my understanding. That was their
21 preference.
22 Q. And that made it consistent with all other
23 machines, correct, according to Mr. Converse?
24 A. That was his goal.
25 MR. WALL: Let me pass the witness while I go
JOYCE A. WISE, RMR, (717) 299-8091

1 to tell us what he knew. But maybe -- I'm trying to make
2 sure I understand your question.
3 BY MR. WALL:
4 Q. Well, didn't all the employees on the platform
5 that night testify they knew they were violating Boeing's
6 rules by continuing to work on the platform that evening?
7 MR. DEAN: Object to the form of the question.
8 THE WITNESS: I'd want to double check their
9 testimony for that precision of what you're asking.
10 BY MR. WALL:
11 Q. And were they all reprimanded for working on
12 that equipment that evening after Slider Number 2 did not
13 extend?
14 A. I don't recall.
15 Q. All right. Would that be a good practice for
16 Boeing to impose upon its employees, that if a piece of
17 equipment did not function properly, that you quit work
18 and get off of it and tag it out?
19 A. Well, that's a very general statement about
20 malfunctions or equipment that's not working properly.
21 There certainly always needs to be
22 considerations for safety.
23 And when it comes to the use of other means for
24 protection, there is expectations that you would rely on
25 the manufacturer to tell you if there's an expectation for
JOYCE A. WISE, RMR, (717) 299-8091

1 back through my notes.
2 Any questions?
3 MR. DOWLING: Kurt, do you want to go? It's
4 Curtis. Right now I don't have questions.
5 MR. ROZELSKY: You go ahead, Kurtis.
6 MR. DOWLING: Right now I don't have any
7 questions.
8 MR. ROZELSKY: Sure.
9 EXAMINATION
10 BY MR. ROZELSKY:
11 Q. Mr. Ebersole, my name is Kurt Rozelsky. I
12 represent Futuramic and Capital Welding.
13 Just a couple of questions.
14 Can you tell me how many hours you have spent on
15 this since December 22nd of 2015?
16 A. I could estimate.
17 Q. Okay.
18 A. In fact, I've been handed some records that may
19 have things past that date.
20 I'll look at that first and then, of course, I
21 have some knowledge of time that would not necessarily
22 have gone on an invoice yet.
23 Q. Is what you were handed, an invoice -- a
24 February invoice?
25 MR. WALL: I just handed him Exhibit 89 -- his
JOYCE A. WISE, RMR, (717) 299-8091

1 part of Exhibit 89.
2 BY MR. ROZELSKY:
3 Q. Okay. Well, I'm looking at anything that you've
4 done since the report, which I think concluded on that --
5 A. Yeah, I understand. And, of course, the one he
6 handed me does not have anything beyond that date and most
7 of my work was -- you know, was not a lot of activity
8 until it got closer to my deposition here.
9 So to answer your question, you know, I mean, I
10 was anticipating this deposition occurring and then
11 weather got in the way, I think as you all know, and so,
12 again, I resumed my preparation as it got closer.
13 Q. What did you do in preparation?
14 A. I reviewed my report. I reviewed various
15 documents, sort of a cursory review. I reviewed, you
16 know, transcripts, at least my summary of transcripts.
17 And I did in the meantime receive the transcript
18 of Mr. Eckhardt, which I did review.
19 And so I guess your question still is the number
20 of hours, approximately?
21 Q. Well, yeah. I mean, are we talking about 10 to
22 15 hours, 15 to 20? Do you have an idea?
23 A. Most likely 10 to 15.
24 Q. Okay. And you said a couple of things that I
25 want to make sure I understand.

JOYCE A. WISE, RMR, (717) 299-8091

1 You indicated that SAR acted as a
2 re-manufacturer once they disabled the sensors.
3 What do you mean by a re-manufacturer?
4 MR. WALL: Object to the form of the question.
5 THE WITNESS: I'll refer to my report, which
6 actually provides a definition.
7 If I could have a moment to find that?
8 BY MR. ROZELSKY:
9 Q. If you'll look at Page 30 of your report.
10 A. Thank you. Yes. That's it.
11 Q. Okay. And where is that definition -- that's
12 from the ANSI standards?
13 A. That's correct.
14 Q. And so when one becomes a re-manufacturer, is
15 that -- would you consider from that point forward to be a
16 substantial change in the condition -- the original
17 condition of the product?
18 A. Yes, always potentially it would be. And I
19 would say in this case it was.
20 Q. Okay. And I think you were talking to Mr. Wall
21 about what you thought happened with regard to Slider 2 on
22 the night of the event. And you indicated that you did
23 not believe it to be a mechanical defect that caused
24 Slider 2 to stop, is that correct?
25 A. That's correct.

JOYCE A. WISE, RMR, (717) 299-8091

1 Q. And the sensor --
2 A. Actually I should clarify, the -- what is
3 potentially -- what can happen with communications is that
4 if there's something that causes a power disturbance, it
5 can influence communications.
6 So potentially there would be a mechanical bind
7 that would result in a power disturbance that would cause
8 a communication loss, but it was a communication loss that
9 resulted in the drive not responding.
10 BY MR. ROZELSKY:
11 Q. Well, you don't have any evidence that something
12 mechanical caused the communication loss on the date of
13 the accident, do you?
14 A. Not that I recall.
15 Q. Okay. What you recall is a change in the sensor
16 and a change in the logic, is that correct?
17 MR. WALL: Object to the form of the question.
18 THE WITNESS: I'm gonna ask you to repeat or
19 rephrase.
20 MR. ROZELSKY: Madam court reporter, can you
21 read that back, please?
22 (Reporter read back last question.)
23 THE WITNESS: Do you mean as it relates to that
24 date?
25

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1 BY MR. ROZELSKY:
2 Q. Yes.
3 A. Yes.
4 Q. Or as it relates to anything after Boeing --
5 after -- let me get the date -- after November the 23rd of
6 2012?
7 A. There was -- there was a commissioning that was
8 not completed, which resulted in the system not being
9 completed to the design, and this was a cause. As well as
10 there were modifications that related to the manual
11 control.
12 Q. And the modifications that were made to the
13 manual control, do you have an opinion as to why those had
14 an effect as to what happened on the night of this
15 incident?
16 A. Yes, that was part of it.
17 Q. Did you make a determination as to what was the
18 proximate cause of the failure of Slider 2 on the night of
19 the incident?
20 A. Well, at the time of the incident, Slider 2
21 failed to extend. The failure was a result of loss of
22 communications. And that was the initial reason the motor
23 didn't move.
24 There were missing -- things that were removed
25 from the design that resulted in this not failing in a

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1 safe manner.

2 Q. And when you say not failing in a safe manner,

3 that is that any -- any changes to the sensors and/or

4 logic contributed or caused it to fail in an unsafe

5 manner?

6 MR. WALL: Object to the form of the question.

7 BY MR. ROZELSKY:

8 Q. Is that your opinion?

9 A. And the sensors you're referring to are those

10 for sensing the fuselage?

11 Q. Yes.

12 A. And whether they -- help me again with the way

13 you phrased that?

14 Q. Well, we've talked about the removal of the

15 sensors.

16 A. Yes.

17 Q. Correct?

18 A. Yes.

19 Q. And I believe you indicated that you -- once the

20 decision was made to remove the sensors, SAR, as the

21 re-manufacturer at that time, you believe had a duty and

22 obligation to warn Boeing, or at least inform Boeing of

23 the potential safety ramifications of removal of the

24 sensors?

25 MR. WALL: Object to the form of question.

JOYCE A. WISE, RMR, (717) 299-8091

1 THE WITNESS: That's correct.

2 BY MR. ROZELSKY:

3 Q. And, in fact, to your knowledge, SAR did not --

4 or breached that standard of care?

5 MR. WALL: Object to the form of the question.

6 THE WITNESS: Well, SAR did not act to prevent

7 this from causing a potentially hazardous situation.

8 What I've not identified is that those were part

9 of what led to the failure of Slider Number 2 to extend at

10 the time of the incident.

11 Does that help to clarify?

12 BY MR. ROZELSKY:

13 Q. I think so.

14 MR. ROZELSKY: I think that's all I have at this

15 time.

16 MR. WALL: Anybody else?

17 Nothing further. Deposition concluded.

18 (Deposition concluded at 11:15 a.m.)

19

20

21

22

23

24

25

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1

2 CERTIFICATE

3 I, DARYL L. EBERSOLE, do hereby certify that I

4 have read the foregoing deposition given by me on February

5 21st, 2016, and I certify it to be a true and correct

6 transcript of my said deposition. In the event that I

7 desire to make changes in the form or substance of my

8 deposition, said changes will be listed below, along with my

9 reasons for making them.

10 PAGE LINE CHANGE AND REASON FOR MAKING CHANGE

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22

DARYL L. EBERSOLE

25 Sworn and subscribed to before me this _____

day of _____, 2016.

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1

2 COUNTY OF LANCASTER : SS

3 COMMONWEALTH OF PENNSYLVANIA :

4

5 I, Joyce A. Wise, RMR, Court Reporter and Notary

6 Public, do hereby certify that DARYL L. EBERSOLE, P.E., the

7 witness, personally appeared before me, being first duly

8 sworn or affirmed to testify to the truth, the whole truth,

9 and nothing but the truth, in answer to the oral questions

10 propounded to him by the attorneys for the respective

11 parties, testified as set forth in the foregoing deposition.

12 I further certify that before taking of said

13 deposition, the above witness was duly sworn or affirmed,

14 that the questions and answers were taken down

15 stenographically by the said Joyce A. Wise, RMR, approved

16 and agreed to, and afterwards reduced to print by means of

17 computer-aided transcription under the direction of the

18 aforesaid Reporter.

19 In testimony whereof, I have hereunto subscribed my

20 hand this 21st day of February 2016.

21

22

23 _____

24 Joyce A. Wise, RMR

25 Notary Public

JOYCE A. WISE, RMR, (717) 299-8091

<p>BY MR. ROZELSKY: [8] 68/9 69/1 70/7 71/9 71/24 73/6 74/1 74/11 BY MR. WALL: [48] 4/9 7/22 8/12 8/24 9/13 9/25 10/11 10/16 11/5 12/10 17/20 17/25 18/14 18/23 19/14 20/18 21/13 21/23 22/3 22/22 24/13 26/7 31/15 32/1 32/14 32/21 33/4 33/10 35/2 35/14 36/24 37/11 37/25 38/4 39/9 41/8 42/14 43/7 45/24 46/11 47/2 49/4 55/3 60/15 61/19 62/1 66/2 66/9 MR. DEAN: [27] 8/5 9/5 10/9 10/14 10/25 17/16 17/24 18/22 19/12 20/16 21/12 21/22 24/8 26/4 31/19 33/7 37/3 41/4 41/22 42/6 43/3 45/15 46/10 46/22 48/25 65/20 66/6 MR. DOWLING: [12] 10/10 11/1 18/11 22/20 34/20 38/2 38/22 54/24 60/10 61/16 68/2 68/5 MR. ROZELSKY: [19] 7/19 8/4 8/18 9/6 9/20 12/9 22/19 31/12 31/20 32/10 32/18 32/25 35/11 36/20 37/24 68/4 68/7 71/19 74/13 MR. WALL: [8] 67/24 68/24 70/3 71/16 73/5 73/24 74/4 74/15 THE WITNESS: [41] 7/20 8/6 8/19 9/7 9/21 11/2 17/17 18/12 19/13 20/17 22/21 24/9 26/5 31/13 31/21 32/11 32/19 33/1 33/8</p>	<p>34/21 35/12 36/21 37/4 38/3 38/23 41/6 41/23 42/7 43/5 45/16 46/23 49/1 54/25 60/11 65/21 66/7 70/4 71/17 71/22 73/25 74/5 \$ \$250 [1] 58/1 \$250 million [1] 58/1 ' '12 [2] 63/4 63/9 1 10 [5] 13/13 14/7 14/16 69/21 69/23 100 [3] 3/13 22/3 22/5 101 [3] 3/14 62/1 62/4 11/23 [1] 19/3 1100 [1] 2/4 11:15 [1] 74/18 1200 [1] 2/14 125 [1] 61/23 128 [1] 61/23 13 [2] 10/22 11/14 145 [1] 2/14 15 [9] 13/18 13/19 13/21 14/7 14/19 14/20 69/22 69/22 69/23 17603 [1] 1/21 18 [1] 67/15 18th [10] 43/15 44/9 44/18 44/25 47/17 47/18 50/13 50/22 64/5 64/19 190 [1] 61/24 19th [1] 1/19 2 20 [1] 69/22 20 feet [3] 40/20 41/20 42/17 2012 [5] 30/22 32/10 34/19 64/19 72/6 2013 [2] 49/14 50/13 2015 [2] 16/10 68/15 2016 [4] 1/19 75/5 75/25 76/20</p>	<p>21 [4] 13/24 14/7 15/13 15/14 216-9152 [1] 2/10 21st [2] 75/5 76/20 23 [1] 19/3 239 [1] 49/16 23rd [4] 30/22 34/19 36/8 39/12 23rd as [1] 33/12 23rd of [1] 72/5 24 [1] 49/14 240 [1] 49/16 24th [2] 31/15 39/17 26 [2] 23/7 24/23 26th [3] 45/14 48/15 53/11 28 [1] 2/9 28th [1] 48/15 29202 [1] 2/19 29402 [1] 2/15 29464 [1] 2/9 29601 [1] 2/4 2:14-CV--01108-DCN [1] 1/8 3 30 [1] 70/9 300 [1] 2/14 300 million [1] 58/5 329-9500 [1] 2/16 34 [1] 30/20 354 [1] 1/20 4 4/26/13 [2] 10/22 11/14 406 [3] 22/6 22/9 22/11 451-4515 [1] 2/20 4515 [1] 2/20 47 [1] 36/10 4th [2] 51/14 53/9 5 5th [2] 63/8 63/9 6 6th [1] 63/9 7 751-7624 [1] 2/5 76 [1] 51/20 7624 [1] 2/5 787 [2] 57/24 58/3</p>
---	---	--

8		across [1] 7/2	ahead [2] 10/2 68/5
803 [1] 2/20		act [1] 74/6	aided [1] 76/17
82 [1] 55/5		acted [3] 54/3 54/10	air [2] 41/21 42/17
843 [2] 2/10 2/16		70/1	aircraft [2] 32/25
8448 [1] 2/19		action [2] 52/12	56/9
864 [1] 2/5		63/25	airplane [4] 10/7
89 [3] 16/4 68/25		actions [3] 15/2	40/21 41/22 42/17
69/1		45/23 54/7	airplanes [3] 33/4
8th [1] 16/10		activation [1] 15/8	58/15 58/16
9		activity [1] 69/7	alarm [8] 34/5 34/11
90 [11] 31/17 33/24		acts [1] 17/14	35/18 35/24 38/24
36/7 40/18 41/4 43/3		actual [3] 21/4	46/16 46/19 54/16
53/18 57/16 58/17		21/12 29/20	alarms [2] 22/17
63/4 65/18		actually [17] 17/3	46/9
9152 [1] 2/10		21/1 26/10 26/24	Alford [1] 2/18
9500 [1] 2/16		27/13 30/11 30/21	all [44] 4/4 5/12
98 [2] 3/11 4/6		50/18 52/13 52/13	6/3 6/23 7/7 7/13
99 [4] 3/12 4/6 5/13		58/9 58/10 59/15	13/3 14/3 19/4 20/7
12/6		61/9 62/19 70/6 71/2	20/15 28/14 28/24
9:17 [1] 4/1		add [4] 8/14 19/18	30/3 30/13 30/24
A		41/3 41/13	30/25 31/19 33/17
a.m [2] 4/1 74/18		added [1] 44/4	40/10 41/12 43/18
ability [2] 55/2		addition [2] 7/17	46/9 50/24 51/4 51/5
58/25		7/25	51/9 53/21 54/13
able [3] 53/6 56/15		adds [1] 9/17	57/1 57/14 57/18
65/25		adjacent [1] 27/3	59/1 63/2 64/21
about [55] 10/3 12/2		advancing [1] 9/11	65/11 65/15 65/24
13/14 13/15 13/19		advise [3] 55/14	66/4 66/11 66/15
13/20 13/21 13/24		55/20 58/21	67/22 69/11 74/14
15/13 17/8 17/18		advised [1] 54/12	Allen [1] 5/21
22/6 22/24 23/13		aeronautical [1]	allow [1] 35/18
23/15 24/17 25/1		56/11	allowed [5] 43/12
25/13 25/19 26/16		affected [1] 44/10	45/5 45/7 45/10 63/3
27/6 28/7 28/8 28/14		affirmed [3] 4/7	along [3] 10/20 33/3
29/7 34/3 34/10 35/9		76/8 76/13	75/8
35/10 39/4 39/19		aforesaid [1] 76/18	already [6] 26/16
43/18 43/19 43/23		after [18] 10/5	27/15 36/19 40/14
43/24 45/15 47/10		11/24 23/7 24/18	57/6 63/18
48/15 50/20 51/6		26/2 27/15 46/4 47/9	also [8] 12/20 14/2
51/14 51/19 52/3		47/11 47/12 47/22	15/3 16/8 26/9 27/17
52/20 52/23 53/12		48/12 58/7 63/11	28/4 61/10
57/10 58/1 63/4		66/12 72/4 72/5 72/5	although [1] 14/21
64/23 66/19 67/7		afterwards [1] 76/16	always [2] 66/21
69/21 70/21 73/14		again [12] 6/5 6/7	70/18
above [1] 76/13		10/22 45/9 59/13	am [2] 25/4 38/9
absolutely [1] 59/18		61/24 63/14 63/21	and/or [2] 12/14
accepted [1] 39/11		63/25 64/4 69/12	73/3
accident [1] 71/13		73/12	anecdotal [6] 51/4
according [4] 10/21		against [1] 17/16	51/5 64/9 64/10
11/13 19/3 67/23		agree [5] 7/24 9/2	64/12 64/16
accounting [1] 58/7		43/1 43/6 59/22	another [2] 43/22
		agreed [3] 60/9 61/5	58/11
		76/16	ANSI [1] 70/12

A
 answer [10] 5/1 5/2
 31/6 33/15 38/8
 40/23 41/6 53/21
 69/9 76/9
 answering [1] 38/9
 answers [1] 76/14
 anticipating [1]
 69/10
 any [36] 4/20 6/1
 6/1 12/12 13/11
 13/17 17/14 24/10
 26/3 27/20 27/23
 28/7 28/8 29/20 39/8
 50/15 51/5 52/12
 54/13 57/21 59/25
 61/11 62/11 62/22
 62/25 63/1 63/4
 63/15 64/4 64/23
 65/7 68/2 68/6 71/11
 73/3 73/3
 anybody [4] 27/13
 39/4 39/8 74/16
 anymore [1] 13/3
 anyone [1] 27/12
 anything [23] 5/19
 17/23 23/2 23/13
 23/24 27/10 39/4
 40/24 41/19 42/16
 43/13 46/2 48/20
 48/24 51/10 57/10
 57/22 63/22 65/7
 65/18 69/3 69/6 72/4
 anywhere [4] 6/9
 6/14 6/24 64/13
 apologize [1] 26/14
 APPEARANCES [1] 2/2
 appeared [1] 76/7
 appears [3] 5/8 16/9
 21/11
 application [1] 30/8
 appropriate [1] 18/4
 appropriately [1]
 15/6
 approved [1] 76/15
 approximately [6]
 10/4 11/16 16/15
 19/6 48/17 69/20
 April [4] 23/8 24/24
 45/14 53/11
 April 1 [3] 23/8
 24/24 45/14
 April 26th [1] 53/11

are [52] 4/4 4/4
 4/14 4/25 6/16 6/23
 7/8 7/12 7/25 8/20
 9/4 9/23 10/2 10/13
 10/18 10/21 11/13
 14/5 16/4 22/14
 23/16 24/5 25/2
 25/20 26/23 26/24
 27/6 28/2 30/9 30/17
 34/13 41/7 42/9
 43/10 43/16 47/8
 47/10 47/15 50/17
 51/1 51/6 51/6 53/4
 60/6 63/16 64/14
 64/15 65/3 65/4
 65/15 69/21 73/9
 argue [1] 43/23
 around [9] 10/23
 31/4 49/6 51/18
 53/25 54/1 58/5
 58/20 63/8
 article [1] 6/15
 as [80]
 ask [7] 17/6 26/14
 33/10 46/15 54/20
 64/22 71/18
 asked [6] 11/8 16/18
 17/11 41/5 57/7
 57/14
 asking [5] 25/6
 31/17 47/15 56/21
 66/9
 aspect [4] 41/2 41/8
 41/12 41/13
 aspects [17] 6/6 7/8
 7/12 7/21 14/5 15/5
 17/20 18/5 18/7
 29/10 38/16 39/19
 42/24 44/15 56/16
 56/16 59/9
 assemble [2] 58/2
 58/3
 assembly [2] 19/5
 30/25
 assist [2] 17/11
 40/18
 assume [3] 7/15
 15/11 63/7
 assumed [1] 8/16
 attempt [1] 48/12
 attempted [2] 45/18
 47/20
 attorney [1] 4/22

attorneys [1] 76/10
 AUTOMATED [2] 1/12
 2/21
 available [1] 25/8
 awaiting [1] 35/14
 aware [25] 5/10 6/12
 6/23 10/4 10/13
 10/18 10/19 10/21
 11/7 11/11 11/13
 17/22 18/8 23/9
 24/10 39/13 43/10
 43/13 45/13 51/3
 51/8 57/19 63/1
 65/15 65/17

B
 B-3 [2] 25/9 25/12
 back [12] 16/5 21/18
 25/25 47/20 50/8
 58/8 62/15 64/1 64/2
 68/1 71/21 71/22
 background [2] 17/10
 29/25
 bad [1] 67/2
 Barnes [1] 2/18
 Barnes/Alford [1]
 2/18
 Bart [2] 16/20 17/4
 Based [1] 5/8
 basic [1] 39/8
 basically [1] 48/14
 basjlaw.com [1] 2/20
 be [67] 5/9 5/13
 5/25 7/21 8/21 8/21
 8/23 9/12 9/12 9/24
 9/24 14/4 18/4 18/19
 19/19 21/11 23/15
 25/11 26/23 26/25
 30/1 30/10 31/25
 32/21 33/18 35/22
 36/2 36/4 36/16
 36/16 41/7 46/15
 46/19 46/19 47/14
 49/14 49/16 49/18
 52/16 53/6 55/9
 55/10 56/14 58/6
 58/20 59/5 60/21
 60/24 61/24 62/13
 64/14 64/15 65/1
 65/25 66/15 66/21
 67/1 67/9 67/11
 67/12 67/13 70/15
 70/18 70/23 71/6

B
 be... [2] 75/5 75/8
 became [1] 38/14
 because [10] 10/5
 11/9 12/21 19/10
 34/17 47/23 48/22
 57/15 58/8 58/16
 become [1] 16/18
 becomes [1] 70/14
 been [25] 4/7 5/6
 6/6 8/12 8/23 8/23
 15/10 16/19 17/5
 18/18 24/15 27/5
 30/3 31/5 33/25 45/4
 45/12 52/14 55/18
 55/19 58/12 60/19
 63/16 67/18 68/18
 before [11] 1/18
 4/16 7/2 7/10 9/4
 11/19 24/10 62/5
 75/25 76/7 76/12
 begin [1] 39/16
 beginning [1] 30/1
 being [18] 7/10 8/12
 8/22 10/7 10/25
 11/10 17/9 30/4 30/5
 31/9 31/14 33/22
 44/4 47/24 49/25
 50/3 72/8 76/7
 believe [28] 5/24
 6/16 11/3 11/20 18/6
 18/13 19/1 19/6
 19/14 20/25 23/14
 24/1 24/3 27/14 30/1
 47/5 52/25 61/8
 61/13 62/6 62/13
 62/14 63/16 65/13
 65/13 70/23 73/19
 73/21
 below [1] 75/8
 between [9] 4/3 23/7
 24/23 39/19 45/14
 52/6 53/13 54/6
 56/18
 beyond [3] 59/18
 59/21 69/6
 bill [6] 16/11 16/13
 29/14 29/15 30/6
 62/7
 billed [1] 62/4
 bills [3] 16/3 16/4
 16/5
 bind [1] 71/6

bit [3] 29/12 45/1
 62/15
 blind [1] 54/2
 block [1] 59/1
 blocks [1] 58/8
 Blvd [1] 2/9
 body [5] 10/7 32/25
 33/23 40/20 46/20
 Boeing [72] 18/10
 18/10 18/20 18/22
 19/9 19/9 20/1 20/8
 20/9 20/10 20/15
 20/20 23/6 23/18
 23/24 24/7 24/18
 24/20 26/11 26/17
 27/20 31/18 32/4
 32/10 34/12 34/17
 34/18 34/20 35/25
 36/8 37/3 38/18
 39/11 39/15 39/19
 39/20 40/5 40/7 40/9
 45/13 47/6 48/7 49/2
 49/16 51/14 52/3
 52/6 52/7 52/19
 52/23 53/17 54/6
 54/8 54/10 54/13
 55/10 55/11 55/14
 55/20 56/5 56/10
 56/18 58/7 58/14
 63/3 63/19 66/16
 67/4 67/19 72/4
 73/22 73/22
 Boeing's [7] 19/20
 54/1 59/25 60/10
 65/17 66/5 67/19
 boring [1] 13/16
 both [1] 57/14
 bottom [2] 21/6
 30/21
 Box [2] 2/14 2/19
 Bradley [1] 5/21
 brake [5] 39/17
 41/15 41/17 42/13
 61/17
 brakes [26] 14/15
 19/18 20/1 22/14
 22/15 22/19 34/18
 38/19 40/5 43/2
 43/11 43/14 43/16
 43/18 43/19 44/2
 44/4 44/7 44/12
 44/13 56/23 59/17
 59/21 59/23 62/17

62/24
 braking [13] 40/7
 40/9 40/14 40/15
 40/16 40/18 40/25
 41/3 41/8 41/12
 41/13 59/10 67/15
 breached [2] 14/12
 74/4
 breadth [2] 23/21
 24/2
 Bridgeside [1] 2/9
 brought [1] 24/21
 build [1] 7/13
 builder [1] 7/10
 building [1] 33/4
 built [1] 54/24
 button [1] 46/21
 buy [2] 57/24 58/3

C
 call [2] 37/13 65/20
 called [1] 4/7
 calling [1] 64/10
 Calls [1] 43/5
 came [5] 10/8 11/12
 17/6 39/6 53/2
 can [15] 5/17 16/13
 31/6 38/8 40/23
 45/21 51/20 53/21
 53/21 59/1 59/13
 68/14 71/3 71/5
 71/20
 can't [3] 6/3 23/15
 58/24
 CAPITAL [3] 1/10 2/6
 68/12
 care [2] 14/13 74/4
 CAROLINA [6] 1/1 2/4
 2/9 2/15 2/19 27/17
 CARR [1] 1/11
 Carrie [2] 29/14
 29/17
 case [11] 10/3 10/16
 13/5 13/14 13/15
 16/10 16/18 17/2
 17/8 30/14 70/19
 category [2] 5/25
 6/7
 Cathedral [1] 13/22
 cause [9] 25/2 43/14
 44/8 48/13 49/3
 64/18 71/7 72/9
 72/18

C	clarify [3] 43/25 71/2 74/11	16/19 34/5 48/11 51/12 71/3 71/5 72/22
caused [7] 44/17 44/19 46/21 49/22 70/23 71/12 73/4	clear [2] 41/7 47/14	company [6] 1/10 1/11 2/6 10/22 11/18 30/19
causes [1] 71/4	close [1] 32/24	company's [1] 16/3
causing [5] 44/2 61/3 61/7 61/12 74/7	closer [2] 69/8 69/12	complaints [1] 51/5
cease [1] 65/19	co [2] 5/23 6/6	complete [17] 24/22 33/2 33/20 34/4 34/8 34/9 34/14 34/22 35/17 37/19 37/20 38/16 40/2 40/3 58/23 60/6 62/20
cell [11] 31/17 33/24 36/7 40/14 40/18 41/4 43/2 53/18 58/16 63/3 65/18	co-workers [2] 5/23 6/6	completed [7] 33/18 34/1 36/5 36/16 45/9 72/8 72/9
cells [2] 40/8 40/13	cold [1] 27/25	completing [6] 35/1 37/22 52/9 54/15 54/16 57/23
center [1] 16/1	collection [1] 14/25	completion [4] 31/23 35/14 36/23 37/8
certain [13] 6/17 14/5 15/4 15/5 17/1 17/3 17/9 25/9 26/23 38/16 39/19 52/25 67/1	Columbia [1] 2/19	composite [3] 32/17 32/21 32/25
certainly [10] 21/21 22/1 31/23 42/2 57/20 58/21 64/7 65/1 66/21 67/12	combined [1] 27/3	computer [1] 76/17
CERTIFICATE [1] 75/2	come [6] 16/24 17/4 17/14 17/15 44/17 53/24	computer-aided [1] 76/17
certification [1] 4/3	comes [2] 9/17 66/23	concern [1] 56/8
certify [4] 75/3 75/5 76/6 76/12	coming [2] 44/24 57/17	concluded [3] 69/4 74/17 74/18
change [9] 38/15 39/22 62/12 65/7 70/16 71/15 71/16 75/10 75/10	comments [1] 28/7	conclusions [1] 23/14
change-out [1] 62/12	commission [1] 8/1	condition [2] 70/16 70/17
changed [1] 37/21	commissioned [7] 8/22 9/4 11/7 33/14 34/14 39/7 54/5	connections [1] 14/23
changes [9] 5/10 11/11 43/17 44/10 45/6 54/13 73/3 75/7 75/8	commissioner [7] 19/19 34/8 34/25 35/21 37/10 37/21 40/3	consider [1] 70/15
characteristics [1] 24/12	commissioning [46] 6/4 6/4 6/9 6/15 6/20 7/5 7/6 7/12 7/19 7/19 7/22 8/1 8/3 8/8 8/10 8/16 9/3 9/5 9/13 9/19 12/14 14/1 14/2 14/6 15/1 15/3 15/5 15/20 20/4 31/15 33/19 33/25 35/7 35/9 35/22 36/2 36/3 37/9 38/14 39/2 39/24 44/16 52/14 54/15 60/4 72/7	consideration [1] 9/9
CHARLESTON [3] 1/2 2/15 58/16	commissions [1] 9/15	considerations [1] 66/22
check [4] 7/1 56/25 64/6 66/8	COMMONWEALTH [1] 76/3	considered [2] 67/11 67/12
checked [3] 50/5 51/9 63/19	communicate [1] 45/2	consistent [7] 23/16 26/24 27/4 49/25 50/3 51/12 67/22
checklist [1] 65/14	communication [18] 9/23 20/21 36/14 37/15 39/18 44/19 45/3 45/21 46/6 49/4 51/13 52/5 53/1 54/6 57/8 71/8 71/8 71/12	contacted [3] 52/19 52/22 52/23
circumstance [1] 49/25	communications [7]	continuation [2] 18/19 37/7
circumstances [2] 26/25 48/5		continue [4] 45/5 45/7 45/8 63/3
claims [1] 14/21		continued [1] 48/11

C
 continuing [2] 34/6
 66/6
 contract [7] 20/10
 21/5 21/12 38/21
 56/18 56/21 56/21
 contracted [2] 19/11
 38/18
 contractor [3] 9/16
 9/18 39/16
 contributed [1] 73/4
 control [26] 13/2
 13/6 13/15 13/24
 14/3 14/5 14/14
 14/24 17/20 18/6
 18/8 18/20 19/19
 24/11 24/13 33/14
 34/1 35/18 38/25
 40/4 44/11 59/7 59/8
 59/9 72/11 72/13
 controlled [1] 44/12
 controller [1] 15/18
 controls [5] 1/12
 2/21 14/15 15/8
 34/11
 Converse [4] 28/22
 57/12 67/18 67/23
 Converse's [1] 57/3
 conversion [1] 60/7
 copies [1] 13/9
 copy [3] 5/7 5/9
 16/11
 corner [1] 5/8
 correct [81]
 Coste [5] 16/20
 16/21 16/22 29/12
 29/23
 costs [2] 57/24 58/2
 could [28] 10/6
 12/12 12/16 13/3
 16/16 21/6 26/3 26/6
 26/23 28/11 32/13
 32/21 32/24 34/18
 46/19 48/5 48/10
 49/3 49/9 51/9 51/13
 52/15 60/21 61/1
 61/15 64/14 68/16
 70/7
 counsel [1] 4/3
 COUNTY [1] 76/2
 couple [4] 65/10
 65/23 68/13 69/24
 course [6] 30/7

30/16 50/12 65/25
 68/20 69/5
 court [3] 1/1 71/20
 76/5
 covered [1] 65/11
 crane [5] 13/21
 13/21 15/1 15/7 15/8
 create [2] 33/9
 45/10
 created [5] 26/13
 26/19 26/21 28/10
 28/19
 cross [1] 14/21
 current [2] 5/7 5/9
 cursory [1] 69/15
 curtis [3] 2/18 2/20
 68/4
 customary [1] 36/3
 cutting [1] 51/16
 CV [5] 1/8 3/11 5/6
 5/7 5/17
 cycles [1] 52/9

D
 D.C [2] 13/2 13/23
 DARYL [7] 1/16 3/3
 4/7 4/13 75/3 75/23
 76/6
 data [4] 14/25 15/1
 15/2 15/7
 date [10] 1/19 5/8
 11/15 49/9 49/11
 68/19 69/6 71/12
 71/24 72/5
 dates [1] 51/18
 DAVID [1] 1/6
 day [4] 47/18 58/15
 75/25 76/20
 DCN [1] 1/8
 deal [3] 15/17 21/19
 22/7
 DEAN [1] 2/8
 December [5] 49/12
 51/14 53/9 63/8
 68/15
 December 22nd of [1]
 68/15
 December 4th [1]
 51/14
 decide [1] 52/3
 decision [2] 67/19
 73/20
 defeated [1] 52/11

defeating [1] 52/6
 defect [2] 26/3
 70/23
 defendant [4] 14/9
 14/12 14/16 14/22
 defendant's [1]
 14/20
 Defendants [1] 1/13
 defense [1] 24/3
 deferred [3] 18/6
 65/10 65/12
 definition [8] 6/8
 6/10 6/13 6/14 6/24
 7/4 70/6 70/11
 definitions [1] 6/16
 deliver [2] 31/25
 39/23
 delivered [9] 5/20
 18/9 32/4 32/10
 34/12 34/19 35/25
 36/8 37/2
 depend [1] 9/22
 dependent [3] 8/11
 8/21 9/3
 deposition [23] 1/16
 4/6 12/20 12/24 16/4
 22/3 28/4 28/9 28/17
 28/21 28/25 57/3
 62/1 65/5 69/8 69/10
 74/17 74/18 75/4
 75/6 75/8 76/11
 76/13
 depositions [3] 4/16
 13/9 13/13
 described [5] 11/4
 21/3 61/10 61/23
 64/15
 description [2]
 49/24 50/3
 descriptions [1]
 51/1
 design [39] 24/2
 34/4 34/8 34/9 34/15
 34/23 35/1 35/2
 35/23 36/16 37/11
 37/14 37/15 37/19
 37/20 37/22 37/22
 37/23 38/2 38/4 38/7
 38/12 38/15 39/23
 40/2 40/12 44/16
 45/3 45/10 45/24
 54/16 56/9 56/13
 57/23 58/23 60/7

D
 design... [3] 62/20
 72/9 72/25
 designed [2] 38/17
 45/22
 designer [1] 38/15
 desire [1] 75/7
 detail [3] 16/6 16/7
 36/6
 details [10] 8/11
 8/20 9/8 13/5 17/8
 23/16 23/22 33/10
 36/2 36/4
 detect [1] 11/10
 detection [4] 36/14
 36/18 37/16 45/3
 determination [1]
 72/17
 determine [2] 9/13
 48/13
 determined [2] 9/12
 18/4
 developer [2] 19/18
 20/3
 did [114]
 didn't [15] 17/18
 25/6 26/11 26/17
 43/22 50/11 54/24
 60/2 60/9 63/22
 63/22 66/4 67/3 67/6
 72/23
 different [5] 20/25
 47/1 50/19 53/5
 65/24
 difficulty [1] 52/1
 direct [1] 4/21
 directed [1] 39/16
 direction [2] 27/14
 76/17
 directly [2] 17/23
 22/7
 disable [1] 54/3
 disabled [2] 47/14
 70/2
 disabling [1] 56/19
 disconnect [6] 54/1
 54/8 57/7 57/15 59/6
 59/24
 disconnected [3]
 60/18 63/3 63/8
 disconnecting [2]
 57/11 59/11
 discussed [1] 63/18

discussion [1] 54/10
 disengaged [1] 43/12
 disengages [1] 42/14
 distribution [1]
 15/19
 DISTRICT [2] 1/1 1/1
 disturbance [2] 71/4
 71/7
 DIVISION [1] 1/2
 do [92]
 document [14] 12/15
 19/24 20/2 20/5 21/1
 22/6 23/9 23/21 25/1
 28/16 28/20 49/10
 56/20 61/11
 documented [4] 50/20
 63/17 64/5 64/13
 documents [6] 23/6
 25/2 25/5 51/1 62/13
 69/15
 does [11] 18/16
 19/16 22/6 55/22
 55/23 56/1 56/3 56/5
 56/10 69/6 74/11
 doesn't [3] 22/1
 44/1 58/25
 doing [10] 8/4 11/25
 12/2 22/18 26/18
 32/16 35/21 48/7
 57/6 59/3
 don't [27] 11/3
 11/15 12/8 13/10
 16/12 16/17 19/8
 23/3 24/1 24/3 28/12
 33/6 43/6 43/22
 51/18 53/8 55/25
 56/12 57/8 57/13
 57/25 58/4 59/4
 66/14 68/4 68/6
 71/11
 done [31] 8/12 8/12
 8/23 8/23 9/13 9/24
 9/25 10/19 11/17
 15/6 15/20 18/17
 18/19 18/21 23/6
 29/20 30/4 33/25
 35/22 36/2 36/16
 37/2 37/5 45/4 55/10
 55/13 58/20 59/16
 60/18 60/19 69/4
 door [2] 14/15 39/6
 doors [1] 13/6
 double [5] 25/22

48/4 48/6 48/23 66/8
 DOWLING [1] 2/18
 down [7] 26/19 26/21
 30/22 45/13 46/3
 51/16 76/14
 downward [1] 27/16
 drawn [1] 23/15
 draws [1] 23/14
 drifted [2] 15/8
 15/11
 drifting [1] 15/4
 drive [4] 45/1 45/2
 48/6 71/9
 duly [3] 4/7 76/7
 76/13
 during [4] 35/22
 37/9 57/16 63/6
 duty [2] 8/16 73/21

E

early [1] 58/9
 easier [1] 30/18
 EBERSOLE [9] 1/16
 3/3 4/7 4/11 4/13
 68/11 75/3 75/23
 76/6
 Eckert [1] 11/21
 Eckhardt [7] 11/24
 16/20 17/13 17/22
 23/1 65/5 69/18
 effect [2] 61/13
 72/14
 effective [1] 9/2
 effectively [8] 35/1
 35/22 37/10 37/21
 38/7 45/2 45/4 45/23
 effort [1] 60/20
 either [2] 29/16
 52/23
 electrical [14]
 16/22 16/25 19/5
 25/15 29/4 44/18
 44/20 44/21 44/21
 44/23 46/3 49/23
 50/2 50/4
 electronic [7] 13/24
 28/13 28/19 28/25
 30/8 30/17 35/10
 elements [1] 36/13
 Ellison [3] 28/5
 57/12 61/23
 else [9] 5/19 23/24
 27/10 28/1 29/1

E			F
else... [4] 29/11	31/24 32/8	31/24 32/8	failing [2] 72/25
42/11 57/10 74/16	everyone [1] 61/5	everyone [1] 61/5	73/2
employed [2] 4/14	everything [1] 28/2	everything [1] 28/2	failure [3] 72/18
5/23	evidence [5] 10/16	evidence [5] 10/16	72/21 74/9
employees [4] 32/23	36/1 46/24 47/1	36/1 46/24 47/1	failures [1] 58/23
66/4 66/16 67/4	71/11	71/11	fall [1] 27/12
employment [1] 6/6	exact [1] 51/18	exact [1] 51/18	fallen [1] 23/17
end [1] 63/11	exactly [1] 52/25	exactly [1] 52/25	falling [1] 27/5
ends [1] 51/15	examination [5] 3/2	examination [5] 3/2	familiar [1] 55/19
engage [1] 44/5	4/9 23/6 47/8 68/9	4/9 23/6 47/8 68/9	familiarity [2]
engaged [3] 14/10	examined [1] 4/8	examined [1] 4/8	23/20 24/4
14/17 14/20	example [3] 9/17	example [3] 9/17	far [8] 14/1 17/4
engages [1] 42/13	23/16 60/7	23/16 60/7	19/1 43/9 46/14 51/2
engineer [3] 16/22	except [1] 4/4	except [1] 4/4	59/21 65/23
29/4 29/8	excuse [2] 58/15	excuse [2] 58/15	fault [2] 17/23
engineering [3] 1/10	63/8	63/8	27/23
2/6 17/1	Exh [2] 4/6 62/1	Exh [2] 4/6 62/1	February [5] 1/19
engineers [7] 55/22	exhaustive [1] 60/19	exhaustive [1] 60/19	63/8 68/24 75/4
55/23 56/1 56/3 56/5	exhibit [18] 3/11	exhibit [18] 3/11	76/20
56/10 56/11	3/12 3/13 3/14 5/13	3/12 3/13 3/14 5/13	February 5th [1]
entire [6] 8/1 8/2	12/6 16/4 21/7 21/8	12/6 16/4 21/7 21/8	63/8
8/17 9/18 9/19 24/22	21/11 22/3 22/5	21/11 22/3 22/5	feet [3] 40/20 41/20
entry [1] 30/6	22/25 51/20 55/5	22/25 51/20 55/5	42/17
equipment [28] 7/6	62/4 68/25 69/1	62/4 68/25 69/1	fell [4] 23/15 26/12
7/10 7/14 7/15 7/18	Exhibit 89 [1] 69/1	Exhibit 89 [1] 69/1	26/18 26/21
7/25 8/2 9/10 9/11	Exhibit 99 [1] 12/6	Exhibit 99 [1] 12/6	field [1] 36/16
9/16 9/20 10/5 10/9	EXHIBITS [1] 3/9	EXHIBITS [1] 3/9	Fifty [1] 24/8
13/1 15/22 24/4	expect [1] 56/15	expect [1] 56/15	file [2] 30/10 30/11
24/18 24/23 31/5	expectation [1]	expectation [1]	filing [1] 4/4
37/6 38/2 39/4 39/23	66/25	66/25	filled [2] 49/7 49/7
40/10 55/16 66/12	expectations [1]	expectations [1]	finally [1] 10/23
66/17 66/20	66/24	66/24	find [13] 23/2 23/4
error [1] 23/23	expenses [1] 58/8	expenses [1] 58/8	23/13 26/3 27/23
escaped [1] 6/2	extend [11] 32/24	extend [11] 32/24	46/2 46/9 46/16
Esquire [5] 1/17 2/3	43/15 44/3 44/8	43/15 44/3 44/8	46/20 51/10 61/21
2/8 2/13 2/18	46/22 63/5 63/10	46/22 63/5 63/10	63/22 70/7
establishes [1]	64/18 66/13 72/21	64/18 66/13 72/21	finding [1] 28/2
19/24	74/9	74/9	fine [1] 50/24
ESTATE [1] 1/6	extended [1] 47/16	extended [1] 47/16	finish [2] 33/15
estimate [1] 68/16	extending [1] 52/9	extending [1] 52/9	34/24
evaluation [1] 60/24	extent [4] 8/10 24/2	extent [4] 8/10 24/2	finished [4] 19/3
evening [3] 65/16	30/2 42/22	30/2 42/22	19/4 30/25 31/19
66/6 66/12			firm [3] 16/23 29/4
event [4] 23/7 52/15	F	F	29/8
70/22 75/6	fabrication [3]	fabrication [3]	first [9] 12/19
eventually [3] 32/12	32/17 32/21 41/21	32/17 32/21 41/21	12/23 16/9 16/19
32/20 33/3	facility [1] 19/20	facility [1] 19/20	17/4 17/6 48/3 68/20
ever [6] 5/19 6/1	fact [3] 63/18 68/18	fact [3] 63/18 68/18	76/7
24/15 43/9 48/20	74/3	74/3	fitness [1] 16/1
63/10	fail [3] 63/5 63/10	fail [3] 63/5 63/10	five [6] 7/17 8/14
every [2] 12/9 65/16	73/4	73/4	10/4 53/12 58/15
everybody [3] 28/1	failed [2] 40/1	failed [2] 40/1	58/15
	72/21	72/21	fix [1] 57/17

F
 fixed [2] 49/21 50/5
 flashing [4] 25/22
 48/4 48/6 48/23
 flipped [3] 47/24
 47/24 48/2
 floor [1] 37/7
 follows [1] 4/8
 foregoing [2] 75/4
 76/11
 Forensics [2] 1/20
 4/15
 form [59] 4/4 4/25
 7/20 8/5 8/6 8/19
 9/6 9/7 9/21 10/10
 10/11 10/15 11/1
 11/2 12/10 17/17
 17/25 18/12 18/23
 19/13 20/17 21/13
 21/23 22/20 22/21
 24/9 26/5 30/17
 31/13 31/20 31/21
 32/11 32/19 33/1
 33/8 34/21 35/12
 36/21 37/4 37/25
 38/3 38/23 39/14
 41/23 43/4 45/16
 46/11 46/23 49/1
 54/25 60/11 65/21
 66/7 70/4 71/17 73/6
 73/25 74/5 75/7
 forth [4] 58/8 64/24
 65/8 76/11
 forward [1] 70/15
 found [19] 14/12
 14/22 15/6 15/7
 17/22 25/14 27/20
 45/14 46/14 47/4
 47/6 47/14 48/8
 48/20 48/24 49/20
 51/14 61/25 63/20
 found it [1] 15/6
 four [1] 12/7
 frame [1] 63/6
 frankly [1] 59/5
 front [3] 16/11 19/8
 20/13
 full [4] 4/11 23/19
 39/2 63/5
 fully [6] 35/5 35/24
 44/8 63/10 64/18
 65/16
 function [4] 8/15

44/23 49/22 66/17
 functioned [1] 34/18
 functioning [1]
 46/10
 further [7] 16/14
 45/5 48/5 50/10
 52/12 74/17 76/12
 fuselage [2] 33/4
 73/10
 FUTURAMIC [27] 1/10
 2/6 10/23 11/8 18/9
 18/21 19/3 19/4
 19/25 20/7 21/19
 22/7 24/21 30/24
 31/19 34/11 34/19
 35/5 36/20 37/2
 39/11 48/7 52/20
 52/23 53/10 62/4
 68/12

G

gave [2] 14/7 64/7
 general [7] 6/16
 20/22 22/12 56/11
 59/19 66/19 67/7
 generally [2] 7/9
 41/11
 generated [1] 46/19
 generating [1] 58/9
 gentleman [1] 27/9
 get [15] 6/13 12/5
 16/8 17/15 30/5
 32/20 32/24 38/6
 42/25 63/21 63/24
 63/25 64/2 66/18
 72/5
 getting [3] 41/20
 41/25 41/25
 give [3] 13/3 16/13
 21/6
 given [7] 4/16 5/6
 6/1 28/12 29/25 30/3
 75/4
 go [12] 8/14 11/8
 12/8 12/21 16/13
 21/18 45/10 59/1
 62/14 67/25 68/3
 68/5
 goal [1] 67/24
 goes [3] 31/15 59/18
 59/20
 going [5] 4/25 50/14
 53/23 58/7 62/15

gone [3] 16/5 65/14
 68/22
 gonna [9] 4/21 21/19
 22/7 26/14 38/6
 43/20 54/20 58/10
 71/18
 good [3] 64/25 65/2
 66/15
 got [6] 10/23 47/21
 57/10 69/8 69/11
 69/12
 green [6] 25/22 29/7
 29/8 48/4 48/6 48/23
 Greenville [1] 2/4
 ground [1] 40/20
 group [2] 16/25 17/1
 guess [9] 13/25 24/3
 46/15 47/8 47/14
 56/21 64/14 67/10
 69/19
 guys [1] 50/19

H

had [50] 5/19 13/5
 14/14 14/25 14/25
 15/18 17/1 17/9
 17/22 18/18 24/11
 24/11 24/12 26/6
 27/25 29/24 29/25
 31/5 33/25 37/23
 40/8 40/14 42/18
 43/2 45/3 45/4 47/24
 47/24 48/4 48/23
 49/16 49/21 50/10
 50/13 50/15 50/22
 51/2 51/13 54/10
 55/14 57/5 57/8
 57/20 58/21 63/24
 63/24 63/24 65/15
 72/13 73/21
 half [2] 12/18 58/11
 hand [4] 11/17 30/18
 62/3 76/20
 handed [5] 21/9
 68/18 68/23 68/25
 69/6
 handwritten [3]
 28/17 28/18 30/15
 happen [1] 71/3
 happened [6] 24/23
 26/11 54/17 64/4
 70/21 72/14
 happy [1] 67/9

H	horizontal [1] 13/16	immediately [3] 23/3
hardware [6] 35/13	horn [1] 38/24	50/12 65/19
62/16 62/17 62/21	hour [1] 12/17	implement [4] 20/23
62/22 62/23	hours [3] 68/14	22/13 59/20 60/5
has [7] 6/2 8/12	69/20 69/22	implied [2] 21/21
8/23 9/23 15/14	how [20] 12/2 15/13	22/1
34/17 39/8	15/19 18/16 19/16	impose [1] 66/16
have [106]	24/7 29/7 37/17	improper [1] 45/14
haven't [1] 24/16	52/25 53/6 55/22	inappropriate [1]
having [8] 4/7 23/17	55/23 56/1 56/3 56/5	15/10
25/21 27/5 42/16	56/10 57/10 57/24	INC [4] 1/11 1/12
45/9 52/1 52/8	58/2 68/14	2/6 2/21
hazard [2] 27/1 27/3	However [2] 44/14	incident [12] 23/19
hazardous [1] 74/7	45/20	25/3 27/21 46/4 47/9
he [30] 11/24 11/25	huge [1] 50/13	47/18 49/7 50/1
12/2 16/24 17/13	human [2] 46/20	72/15 72/19 72/20
17/15 17/18 17/18	47/24	74/10
18/6 23/15 26/13	hundred [1] 24/8	incidents [1] 50/20
26/18 26/20 26/21	I	include [3] 44/15
27/15 29/5 29/6 29/9	I'd [11] 7/1 27/7	45/22 57/23
29/24 29/24 29/25	33/15 34/24 56/25	included [9] 33/17
57/5 57/5 57/8 60/14	64/6 65/22 66/8 67/9	34/4 39/20 45/3 49/3
65/7 65/10 65/11	67/17 67/18	54/14 56/20 60/4
66/1 69/5	I'll [6] 6/12 12/15	62/20
heard [2] 26/23 27/4	36/9 46/15 68/20	includes [8] 21/16
held [1] 42/13	70/5	21/17 22/15 22/16
help [3] 52/11 73/12	I'm [41] 4/16 6/17	22/16 39/24 59/8
74/11	7/3 10/19 11/11	62/9
helps [1] 49/16	12/20 16/25 17/3	including [2] 20/4
her [1] 29/18	21/2 21/3 22/10 23/9	56/16
here [7] 19/8 24/22	24/10 25/6 25/13	incorrect [3] 23/4
25/11 49/18 55/12	25/20 26/14 27/13	23/13 25/17
60/13 69/8	28/15 31/17 34/16	INDEX [2] 3/1 3/9
Here's [2] 21/4 21/4	35/9 35/9 39/13	indicated [3] 70/1
hereby [4] 4/3 4/4	43/13 43/18 43/18	70/22 73/19
75/3 76/6	43/20 49/15 51/3	individual [1] 15/25
hereunto [1] 76/19	51/8 52/25 54/20	individualized [1]
high [1] 56/8	56/2 56/4 56/6 57/19	55/9
him [4] 23/16 27/12	63/1 66/1 69/3 71/18	INDIVIDUALLY [1] 1/5
68/25 76/10	I've [11] 5/6 24/6	individuals [1]
hired [1] 4/22	27/25 30/3 36/15	65/24
his [7] 11/22 11/24	55/7 58/13 58/13	influence [2] 15/19
11/25 17/2 28/8	62/3 68/18 74/8	71/5
67/24 68/25	idea [2] 67/14 69/22	inform [1] 73/22
hitting [1] 61/9	identified [14] 24/6	information [5] 13/4
hold [4] 41/16 42/10	25/21 25/23 36/9	14/13 29/20 30/1
42/12 44/12	36/15 48/4 48/5	57/18
holding [4] 42/2	48/22 49/2 49/3	informed [1] 53/10
42/11 42/18 43/7	53/16 55/12 63/13	initial [2] 27/14
hole [9] 23/17 26/12	74/8	72/22
26/19 26/21 27/3	identify [4] 25/9	initially [1] 47/13
27/5 27/12 27/16	57/21 60/21 60/22	injected [5] 19/21
45/11		37/9 38/13 40/1 40/2

<p>I</p> <p>injecting [3] 34/7 34/25 35/20</p> <p>injury [2] 24/18 24/19</p> <p>insisted [1] 55/10</p> <p>inspected [1] 46/3</p> <p>install [3] 7/13 53/7 62/18</p> <p>installation [1] 15/21</p> <p>installed [7] 7/18 10/8 10/24 46/17 51/23 53/12 62/16</p> <p>installing [1] 22/18</p> <p>INTEC [30] 1/11 2/21 10/7 10/22 11/3 11/7 19/25 21/20 22/8 24/21 34/11 35/6 36/19 36/22 45/13 46/2 48/7 51/23 52/20 52/23 53/2 53/6 54/24 55/1 55/8 57/17 60/10 60/15 62/4 62/11</p> <p>intended [23] 7/16 8/18 31/2 31/7 31/11 31/17 32/3 32/5 32/6 32/9 32/12 32/18 33/6 33/13 35/5 40/19 41/1 41/4 41/14 41/19 43/2 44/5 52/2</p> <p>intent [1] 41/15</p> <p>intentional [1] 55/2</p> <p>interact [2] 19/17 20/3</p> <p>interacted [2] 19/25 29/12</p> <p>interlock [1] 14/15</p> <p>investigated [1] 17/9</p> <p>investigating [2] 17/19 17/20</p> <p>investigation [13] 18/4 18/5 23/19 23/20 23/25 24/1 24/17 24/19 24/22 25/3 26/10 26/17 48/8</p> <p>investigators [1] 17/12</p> <p>invoice [3] 68/22</p>	<p>68/23 68/24</p> <p>invoices [2] 21/17 56/20</p> <p>involve [1] 12/13</p> <p>involved [4] 16/9 16/18 17/15 57/11</p> <p>involvement [1] 17/4</p> <p>IRS [1] 58/6</p> <p>is [115]</p> <p>isn't [3] 38/21 48/21 48/25</p> <p>issue [5] 6/2 12/13 29/23 46/6 60/20</p> <p>issues [5] 5/20 17/14 51/2 52/10 65/11</p> <p>it [201]</p> <p>it S-A-R [1] 37/13</p> <p>it's [28] 6/19 7/16 12/20 18/22 21/21 21/21 22/1 22/25 23/18 25/21 26/10 26/17 26/20 27/4 30/21 36/13 37/18 42/10 43/6 51/22 53/17 56/21 58/14 64/12 64/25 65/2 67/2 68/3</p> <p>its [17] 7/16 18/10 33/12 34/9 34/15 34/22 35/1 36/23 37/19 37/20 37/22 39/16 40/19 41/4 57/23 58/23 66/16</p> <p>itself [1] 28/18</p> <p>J</p> <p>January [7] 49/6 49/14 50/15 51/7 63/4 63/14 63/20</p> <p>January 24 [1] 49/14</p> <p>job [2] 7/9 59/4</p> <p>John [2] 29/7 29/8</p> <p>join [1] 17/11</p> <p>joining [1] 17/19</p> <p>JOYCE [4] 1/18 76/5 76/15 76/23</p> <p>JR [1] 1/7</p> <p>jumping [1] 10/2</p> <p>just [19] 12/15 21/8 22/5 25/4 26/18 28/3 29/19 30/5 30/17 33/10 41/8 43/20</p>	<p>56/11 58/3 60/9 64/15 64/16 68/13 68/25</p> <p>K</p> <p>kdean [1] 2/10</p> <p>keep [4] 13/8 13/9 30/4 43/20</p> <p>KEVIN [1] 2/8</p> <p>kind [2] 15/22 42/8</p> <p>king [1] 2/14</p> <p>knew [3] 65/24 66/1 66/5</p> <p>know [36] 4/18 5/23 6/12 6/14 11/15 18/3 26/11 26/18 30/9 32/3 33/6 40/5 41/24 42/21 49/22 51/18 51/23 52/19 53/2 53/6 55/25 56/12 57/8 57/10 57/24 58/2 59/10 61/11 62/11 65/1 67/8 67/14 69/7 69/9 69/11 69/16</p> <p>knowledge [8] 17/1 17/10 39/2 39/8 56/15 59/4 68/21 74/3</p> <p>knows [2] 39/4 39/5</p> <p>KURT [3] 2/3 68/3 68/11</p> <p>kurt.rozelsky [1] 2/5</p> <p>Kurtis [1] 68/5</p> <p>L</p> <p>Ladder [2] 36/10 36/11</p> <p>Lancaster [2] 1/21 76/2</p> <p>language [2] 8/3 57/9</p> <p>large [1] 13/21</p> <p>laser [6] 10/6 57/15 62/9 62/12 63/2 64/17</p> <p>lasers [9] 51/15 51/23 56/19 56/23 56/24 57/7 57/11 62/7 63/7</p> <p>last [3] 12/7 64/22 71/22</p> <p>later [7] 7/17 8/14</p>
--	---	--

<p>L</p> <p>later... [5] 9/3 11/12 12/5 42/25 43/24</p> <p>lawyers [1] 12/8</p> <p>lead [1] 48/5</p> <p>leader [1] 16/25</p> <p>least [4] 11/21 64/16 69/16 73/22</p> <p>Leatherwood [1] 2/3</p> <p>leave [2] 54/3 60/25</p> <p>led [1] 74/9</p> <p>length [1] 63/5</p> <p>Les [2] 29/3 29/4</p> <p>less [1] 53/13</p> <p>let [9] 11/17 30/18 41/4 55/5 62/3 64/21 64/22 67/25 72/5</p> <p>let's [4] 7/15 10/3 21/18 63/7</p> <p>level [1] 40/19</p> <p>librarian [1] 29/17</p> <p>lift [1] 19/22</p> <p>light [1] 25/22</p> <p>like [14] 6/10 6/10 16/16 21/3 21/8 27/25 33/15 34/24 36/2 42/10 43/13 59/13 65/14 67/18</p> <p>likely [1] 69/23</p> <p>limited [1] 55/1</p> <p>LINE [1] 75/10</p> <p>LISA [2] 1/5 2/11</p> <p>list [1] 13/8</p> <p>listed [2] 12/21 75/8</p> <p>literature [2] 6/25 6/25</p> <p>little [2] 53/13 62/15</p> <p>LLC [1] 2/8</p> <p>location [2] 18/20 60/23</p> <p>locations [1] 52/10</p> <p>log [1] 25/18</p> <p>logic [8] 20/23 22/13 43/17 44/10 59/20 60/5 71/16 73/4</p> <p>Lois [2] 29/14 29/17</p> <p>long [1] 53/6</p> <p>look [13] 5/17 12/6 12/22 16/16 21/6</p>	<p>27/8 29/24 30/22 51/20 64/21 67/9 68/20 70/9</p> <p>looked [1] 47/13</p> <p>looking [4] 21/3 46/7 49/10 69/3</p> <p>loss [10] 37/15 44/19 45/3 45/21 49/4 51/13 71/8 71/8 71/12 72/21</p> <p>lot [2] 60/2 69/7</p> <p>Lynn [1] 4/13</p> <p>M</p> <p>machine [36] 7/10 8/17 9/5 10/24 11/9 13/16 13/16 17/24 18/9 18/22 19/10 19/17 20/3 20/4 24/2 24/21 25/25 34/18 35/25 37/3 38/12 39/5 39/11 39/16 40/6 41/1 41/4 41/14 41/20 41/21 47/17 48/14 50/8 54/24 64/1 65/19</p> <p>machinery [4] 34/14 36/3 37/6 39/9</p> <p>machines [2] 24/7 67/23</p> <p>Madam [1] 71/20</p> <p>made [15] 11/3 11/4 11/5 28/17 43/17 44/10 45/6 54/18 54/21 54/21 57/22 60/21 67/22 72/12 73/20</p> <p>maintenance [2] 55/2 65/20</p> <p>make [16] 7/24 9/25 10/7 28/7 28/8 30/18 32/13 33/18 33/20 34/2 40/4 58/10 66/1 69/25 72/17 75/7</p> <p>making [8] 10/23 35/17 54/14 54/14 58/15 59/2 75/9 75/10</p> <p>malfunctioned [1] 65/18</p> <p>malfunctions [1] 66/20</p> <p>manage [1] 45/18</p>	<p>managed [1] 63/21</p> <p>manner [4] 61/1 73/1 73/2 73/5</p> <p>manual [8] 45/6 54/15 54/21 54/22 55/1 60/7 72/10 72/13</p> <p>manually [1] 55/9</p> <p>manufacture [2] 7/13 56/13</p> <p>manufacturer [12] 9/15 19/22 38/14 38/25 39/23 54/12 55/16 66/25 70/2 70/3 70/14 73/21</p> <p>manufacturing [3] 36/3 37/6 39/5</p> <p>many [10] 9/8 24/7 55/22 55/23 56/1 56/3 56/5 56/10 60/6 68/14</p> <p>March [15] 23/7 24/23 43/15 44/9 44/18 44/25 45/14 47/17 47/18 50/13 50/22 51/7 63/14 64/5 64/19</p> <p>March 18th [10] 43/15 44/9 44/18 44/25 47/17 47/18 50/13 50/22 64/5 64/19</p> <p>March 26 [2] 23/7 24/23</p> <p>March 26th [1] 45/14</p> <p>MARK [2] 1/17 2/13</p> <p>mark.wall [1] 2/15</p> <p>marked [6] 3/10 4/6 22/3 22/5 62/1 62/3</p> <p>matching [1] 40/12</p> <p>material [7] 10/6 10/13 10/24 11/10 51/16 61/6 61/9</p> <p>materials [1] 25/8</p> <p>matter [3] 13/11 29/18 44/1</p> <p>may [8] 11/20 25/11 29/18 49/14 58/6 61/24 62/13 68/18</p> <p>maybe [3] 24/25 49/10 66/1</p> <p>MCMaster [1] 1/11</p> <p>MCMaster-CARR [1]</p>
--	---	---

M		
MCMaster-CARR... [1]	60/14	54/17 65/25
1/11	modifications [4]	Mr. Wall [1] 70/20
me [36] 4/21 6/3 9/2	57/21 58/22 72/10	Mt [1] 2/9
11/17 12/12 13/3	72/12	much [2] 57/24 58/2
13/20 14/7 16/16	modified [2] 38/4	my [50] 6/6 6/10
17/18 18/7 19/8 21/9	40/22	16/19 17/4 18/17
23/23 29/25 30/18	modify [2] 39/22	20/12 23/20 24/6
33/7 33/10 34/16	39/22	25/4 25/9 25/23 26/7
34/16 43/1 55/5	moment [3] 12/15	27/22 29/10 30/11
58/15 59/22 62/3	61/15 70/7	31/4 32/6 33/15 36/9
63/8 64/21 64/22	month [1] 47/10	36/15 38/8 38/11
67/25 68/14 69/6	months [5] 7/17 8/14	39/18 40/11 40/17
72/5 73/12 75/4	10/4 48/12 53/12	40/23 45/17 46/7
75/25 76/7	Moore [1] 2/3	46/18 48/16 51/25
mean [6] 50/12 54/19	more [10] 26/23	52/5 52/8 53/4 53/21
69/9 69/21 70/3	33/10 40/7 43/21	60/12 64/21 67/20
71/23	44/14 46/15 50/18	68/1 68/11 69/7 69/8
means [4] 40/15	56/7 56/15 67/8	69/12 69/14 69/16
64/12 66/23 76/16	most [2] 69/6 69/23	70/5 75/6 75/7 75/8
meantime [1] 69/17	Motley [1] 2/8	76/19
measures [2] 67/1	motleyrice.com [1]	
67/13	2/10	N
mechanical [15] 19/4	motor [2] 44/13	N-A-Z [1] 60/14
25/15 29/8 30/25	72/22	Nace [1] 29/15
35/11 36/7 44/18	motors [3] 22/16	name [4] 4/11 36/6
44/20 49/23 50/2	44/5 44/6	36/6 68/11
54/18 56/1 70/23	move [3] 43/9 64/2	National [1] 13/22
71/6 71/12	72/23	nature [2] 23/15
media [1] 28/13	moved [1] 58/8	51/25
meet [2] 35/18 39/24	movement [3] 27/14	Naz [2] 60/13 60/13
memory [1] 7/18	43/12 51/16	nearby [1] 27/9
men [2] 40/19 41/20	moving [1] 27/16	necessarily [1]
mentioned [1] 49/10	Mr [2] 3/4 3/5	68/21
met [1] 7/8	Mr. [17] 4/11 11/21	necessary [10] 8/11
Metro [1] 13/2	11/24 17/13 17/22	33/17 33/18 34/14
Michael [1] 28/4	23/1 54/17 57/3	34/23 35/8 39/21
might [1] 67/17	60/13 61/23 65/5	40/3 53/20 53/24
milling [1] 13/16	65/25 67/18 67/23	need [11] 12/8 12/21
million [2] 58/1	68/11 69/18 70/20	28/2 28/3 34/17
58/5	Mr. Converse [2]	36/23 39/23 43/23
mine [1] 9/8	67/18 67/23	43/25 67/13 67/17
minute [1] 6/13	Mr. Converse's [1]	needed [5] 17/15
mischaracterize [2]	57/3	35/21 36/4 57/15
18/16 19/16	Mr. Ebersole [2]	58/20
mischaracterizes [5]	4/11 68/11	needs [8] 8/23 9/12
10/16 18/13 19/1	Mr. Eckert [1] 11/21	9/12 9/24 9/24 66/21
19/14 42/8	Mr. Eckhardt [6]	67/11 67/12
mischaracterizing [1]	11/24 17/13 17/22	negligent [1] 17/14
59/12	23/1 65/5 69/18	network [1] 48/11
missing [1] 72/24	Mr. Ellison [1]	never [2] 7/2 65/25
mobile [1] 56/16	61/23	Nevertheless [1]
modification [1]	Mr. Naz [1] 60/13	39/21
	Mr. Priester [2]	new [4] 8/14 9/18

N	now [16] 5/21 19/10	47/12 50/1 52/14
new... [2] 10/8 53/7	22/24 24/17 26/9	occurrence [1] 45/20
night [4] 66/5 70/22	30/18 41/8 43/16	occurring [1] 69/10
72/14 72/18	48/14 49/6 51/14	off [2] 40/20 66/18
no [41] 1/8 3/11	53/4 63/2 67/8 68/4	offering [2] 59/5
3/12 3/13 3/14 5/10	68/6	67/10
6/12 9/8 13/10 15/8	number [42] 5/13	offhand [9] 6/17 7/3
16/7 16/12 17/18	12/24 13/13 13/18	11/15 27/11 53/8
17/22 17/23 22/3	14/8 14/10 14/16	55/25 56/12 57/13
22/22 24/16 25/14	14/19 14/20 21/7	57/25
27/24 28/17 29/10	21/8 22/5 25/15	office [1] 2/14
38/10 42/5 43/6	25/18 25/24 26/4	offline [1] 24/21
43/22 46/5 46/6 48/1	26/9 26/16 43/15	oh [2] 15/16 15/24
48/20 48/24 50/10	44/3 44/8 44/17	okay [32] 5/10 5/15
50/15 51/9 53/23	44/24 46/21 47/16	6/1 6/19 7/24 12/5
58/4 58/19 62/1	48/8 48/21 48/24	12/25 21/12 23/5
62/19 64/20 65/9	49/8 49/13 49/20	27/10 27/23 27/25
None [1] 50/17	51/10 51/20 53/18	30/13 39/15 43/14
North [1] 1/20	55/5 58/17 62/4	43/16 43/20 48/2
Nos [1] 4/6	63/19 64/18 66/12	53/15 57/2 58/14
not [135]	69/19 74/9	59/22 60/17 62/3
Notary [2] 76/5	numbers [1] 14/7	63/2 63/18 68/17
76/23	O	69/3 69/24 70/11
note [1] 30/15	O'Donel [1] 29/14	70/20 71/15
notes [11] 28/8	object [57] 4/25	on-site [1] 39/3
28/17 28/18 28/24	7/20 8/5 8/6 8/19	once [2] 70/2 73/19
28/25 30/4 30/9	9/6 9/7 9/21 10/10	one [39] 6/17 12/9
30/13 30/17 64/21	10/11 10/15 11/1	12/19 12/23 15/17
68/1	11/2 12/10 17/17	17/5 23/10 23/23
nothing [10] 5/24	17/25 18/12 18/23	24/8 24/11 24/11
29/1 37/23 43/2	19/13 20/17 21/13	24/12 25/2 25/3
45/14 48/8 63/20	21/23 22/20 22/21	25/10 25/12 25/14
64/4 74/17 76/9	24/9 26/5 31/13	27/11 36/6 45/7
November [13] 16/10	31/20 31/21 32/11	48/20 48/24 49/6
30/22 31/18 32/10	32/19 33/1 33/8	49/21 50/21 51/3
33/12 34/19 35/4	34/21 35/12 36/21	51/7 51/7 51/9 56/7
36/8 39/12 39/17	37/4 37/25 38/3	56/20 57/1 59/23
48/15 50/15 72/5	38/23 41/5 41/23	61/24 62/14 65/17
November 23rd [4]	42/7 43/4 45/16	67/14 69/5 70/14
30/22 34/19 36/8	46/11 46/23 49/1	ones [7] 5/20 14/3
39/12	54/25 60/11 65/21	14/4 14/5 39/3 51/6
November 23rd that	66/7 70/4 71/17 73/6	64/6
[1] 35/4	73/25 74/5	only [9] 8/2 22/18
November 23rd when	objections [1] 4/4	27/11 30/15 38/21
[1] 31/18	obligation [1] 73/22	50/21 51/6 58/13
November 24th [1]	observed [1] 23/23	67/14
39/17	occasionally [1]	operating [1] 35/5
November 26th [1]	29/18	operation [7] 7/7
48/15	occasions [1] 65/10	7/16 8/9 20/23 22/13
November 30th until	occur [1] 45/21	22/15 59/20
[1] 50/15	occurred [7] 11/14	operator [2] 15/2
November 8th [1]	15/4 26/7 47/10	15/9
16/10		operators [1] 52/18

O
 opinion [10] 9/19
 23/18 26/10 26/17
 26/20 46/20 58/14
 61/2 72/13 73/8
 opinions [4] 14/24
 64/23 65/3 65/7
 opposed [1] 67/15
 oral [1] 76/9
 order [4] 20/23
 22/13 34/22 59/19
 orders [1] 49/13
 organizations [1]
 5/24
 original [3] 9/15
 57/23 70/16
 originally [1] 11/9
 OSHA [2] 27/17 27/21
 other [24] 13/11
 14/4 26/21 28/18
 40/8 40/12 42/23
 42/23 50/24 57/11
 59/24 59/25 60/15
 62/11 62/12 62/13
 62/17 62/17 62/25
 63/1 63/15 64/6
 66/23 67/22
 others [5] 13/17
 16/16 25/11 57/19
 61/24
 otherwise [1] 46/25
 our [5] 16/22 29/4
 29/8 29/17 30/7
 Ours [1] 4/20
 out [16] 33/23 43/9
 44/17 44/24 45/10
 46/16 47/17 49/7
 49/7 49/20 51/9
 51/14 53/18 62/12
 65/20 66/18
 over [10] 7/11 9/16
 13/22 15/9 18/7
 18/10 19/9 56/13
 58/7 58/8
 own [1] 19/4
 owned [1] 19/10
 owner [1] 7/11
 owns [1] 24/8

P
 P.E [3] 1/16 3/3
 76/6
 P.O [1] 2/19

PA [1] 1/21
 page [9] 20/25 22/11
 25/8 25/23 30/11
 30/20 30/21 70/9
 75/10
 Page 1 [1] 25/8
 Page 30 [1] 70/9
 Page 34 [1] 30/20
 Page 4 [1] 20/25
 Page 406 [1] 22/11
 Pages [1] 61/23
 paper [3] 5/20 58/6
 58/12
 papers [2] 5/19 6/2
 parlance [1] 60/17
 part [20] 8/8 8/22
 8/22 9/11 11/22
 15/20 17/14 22/25
 30/10 36/2 38/14
 38/20 42/21 43/7
 44/12 44/21 52/14
 69/1 72/16 74/8
 partial [1] 45/11
 particular [1] 17/19
 particularly [1]
 56/9
 parties [2] 4/3
 76/11
 parts [2] 44/11
 58/13
 pass [1] 67/25
 passengers [1] 13/6
 past [1] 68/19
 peer [1] 29/6
 PENNSYLVANIA [1]
 76/3
 people [5] 4/25 5/22
 7/13 23/22 60/25
 perfectly [1] 50/24
 perform [1] 41/4
 performed [1] 30/5
 performing [1] 7/16
 perhaps [1] 25/10
 period [2] 53/18
 57/16
 person [1] 15/25
 personal [2] 1/6 7/4
 personally [1] 76/7
 personnel [1] 55/3
 PEs [1] 56/11
 Peter [6] 16/20
 16/21 16/22 17/5
 29/12 29/23

phrased [1] 73/13
 physical [1] 35/10
 pick [4] 10/6 10/8
 10/13 10/24
 picking [5] 9/10
 9/23 40/19 51/15
 61/6
 piece [14] 7/15 7/18
 7/25 8/1 8/2 9/10
 9/11 9/16 9/19 10/5
 24/22 37/6 40/12
 66/16
 pieces [1] 10/13
 place [11] 1/20 7/22
 9/24 18/8 20/21 23/7
 36/14 36/17 36/19
 36/22 54/4
 placed [1] 11/9
 placeholder [1]
 36/15
 plaintiff [4] 1/8
 14/9 14/16 26/12
 plaintiff's [3]
 14/10 14/17 15/16
 planes [1] 58/10
 plant [3] 18/10
 31/18 57/6
 platform [28] 19/5
 20/22 22/11 22/12
 30/25 31/2 31/7
 31/11 31/18 31/25
 32/4 32/9 32/14
 32/18 32/23 33/3
 33/9 33/13 33/18
 33/21 33/23 56/17
 57/16 59/19 60/25
 65/16 66/4 66/6
 PLC [12] 5/21 7/18
 8/15 9/17 12/14
 13/15 14/13 14/23
 34/10 36/7 45/15
 46/4
 Pleasant [1] 2/9
 please [5] 4/11
 12/17 19/11 21/6
 71/21
 point [8] 12/19
 18/17 31/4 31/23
 32/20 42/6 54/14
 70/15
 points [2] 53/13
 65/23
 policy [1] 67/2

P														
<p>portion [2] 8/3 56/22 position [9] 19/23 42/1 42/3 42/19 43/7 43/9 53/17 55/17 59/2 positions [1] 41/16 possession [1] 39/15 Post [1] 2/14 potential [4] 23/23 24/12 55/20 73/23 potentially [7] 14/4 17/19 62/21 70/18 71/3 71/6 74/7 power [3] 15/19 71/4 71/7 practice [2] 16/25 66/15 practices [1] 58/7 precedent [1] 45/20 precise [1] 57/9 precision [1] 66/9 preference [1] 67/21 Preister [1] 2/11 preliminary [1] 18/18 preparation [4] 15/21 37/7 69/12 69/13 prepared [5] 11/21 23/9 30/19 31/9 48/18 presentation [1] 5/19 presentations [1] 5/18 pretty [1] 65/2 prevent [3] 44/24 54/17 74/6 prevented [2] 33/22 35/5 prevention [1] 34/6 previously [2] 8/24 22/25 PRIESTER [4] 1/5 1/7 54/17 65/25 Prince [1] 1/20 print [1] 76/16 printed [1] 28/12 prior [3] 17/2 17/10 19/25 probably [3] 56/8</p>	<p>65/13 65/14 problem [19] 25/15 25/21 42/5 42/5 45/18 48/10 48/13 48/13 50/10 50/12 50/13 50/15 50/22 51/11 52/4 52/12 52/20 53/10 57/6 problems [1] 24/13 proceeded [1] 38/15 process [1] 32/1 produced [1] 30/12 product [2] 39/24 70/17 production [2] 32/13 48/18 Profibus [1] 48/11 profit [2] 58/9 58/10 program [3] 7/14 36/10 36/11 programmable [2] 13/1 14/14 programmed [3] 13/21 14/24 15/18 programmer [1] 39/3 programming [2] 33/19 36/17 project [4] 29/21 31/24 59/25 60/4 projects [2] 59/22 59/23 promised [1] 20/22 promptly [1] 52/17 proper [2] 23/19 52/14 properly [12] 14/22 25/25 44/24 46/5 46/10 46/22 47/21 51/24 63/5 66/17 66/20 67/5 properties [3] 35/10 35/10 35/11 proposal [3] 20/6 20/9 21/3 proposed [7] 19/17 19/18 19/19 20/2 38/24 39/1 59/3 propounded [1] 76/10 protection [1] 66/24 provide [4] 33/3 36/18 41/15 52/17 provided [6] 5/13</p>	<p>5/22 12/13 14/13 49/24 55/1 provides [1] 70/6 proximate [1] 72/18 Public [2] 76/6 76/23 purchaser [1] 7/11 purpose [8] 7/16 8/17 33/2 40/19 41/1 41/4 41/20 43/2 pushed [1] 46/21 put [6] 36/19 38/18 39/1 50/8 64/1 64/2</p> <tr> <th data-bbox="1047 493 1541 556">Q</th><th data-bbox="568 493 1047 556"></th><th data-bbox="1047 493 1541 556"></th></tr> <tr> <td data-bbox="1047 556 1541 1281"> <p>question [41] 4/4 5/1 5/1 5/3 13/19 13/25 17/25 20/18 25/7 26/5 31/6 32/6 33/8 37/4 38/8 38/9 38/11 40/23 41/5 41/23 43/4 45/16 46/11 46/23 49/1 52/22 53/22 54/20 64/22 65/21 66/2 66/7 67/7 69/9 69/19 70/4 71/17 71/22 73/6 73/25 74/5 questions [7] 4/21 68/2 68/4 68/7 68/13 76/9 76/14 quit [2] 58/15 66/17 quotation [4] 59/2 59/6 59/7 59/12 quote [2] 8/2 59/11</p> </td><td data-bbox="568 556 1047 1281"></td><td data-bbox="1047 556 1541 1281"></td></tr> <tr> <th data-bbox="1047 1281 1541 1344">R</th><th data-bbox="568 1281 1047 1344"></th><th data-bbox="1047 1281 1541 1344"></th></tr> <tr> <td data-bbox="1047 1344 1541 2013"> <p>ramifications [6] 54/13 55/15 55/21 57/21 58/22 73/23 re [14] 8/1 8/16 9/5 10/8 11/8 19/22 38/14 39/22 54/12 55/16 70/2 70/3 70/14 73/21 re-commissioning [3] 8/1 8/16 9/5 re-installed [1] 10/8 re-manufacturer [8] 19/22 38/14 54/12 55/16 70/2 70/3 70/14 73/21 re-modify [1] 39/22</p> </td><td data-bbox="568 1344 1047 2013"></td><td data-bbox="1047 1344 1541 2013"></td></tr>	Q			<p>question [41] 4/4 5/1 5/1 5/3 13/19 13/25 17/25 20/18 25/7 26/5 31/6 32/6 33/8 37/4 38/8 38/9 38/11 40/23 41/5 41/23 43/4 45/16 46/11 46/23 49/1 52/22 53/22 54/20 64/22 65/21 66/2 66/7 67/7 69/9 69/19 70/4 71/17 71/22 73/6 73/25 74/5 questions [7] 4/21 68/2 68/4 68/7 68/13 76/9 76/14 quit [2] 58/15 66/17 quotation [4] 59/2 59/6 59/7 59/12 quote [2] 8/2 59/11</p>			R			<p>ramifications [6] 54/13 55/15 55/21 57/21 58/22 73/23 re [14] 8/1 8/16 9/5 10/8 11/8 19/22 38/14 39/22 54/12 55/16 70/2 70/3 70/14 73/21 re-commissioning [3] 8/1 8/16 9/5 re-installed [1] 10/8 re-manufacturer [8] 19/22 38/14 54/12 55/16 70/2 70/3 70/14 73/21 re-modify [1] 39/22</p>		
Q														
<p>question [41] 4/4 5/1 5/1 5/3 13/19 13/25 17/25 20/18 25/7 26/5 31/6 32/6 33/8 37/4 38/8 38/9 38/11 40/23 41/5 41/23 43/4 45/16 46/11 46/23 49/1 52/22 53/22 54/20 64/22 65/21 66/2 66/7 67/7 69/9 69/19 70/4 71/17 71/22 73/6 73/25 74/5 questions [7] 4/21 68/2 68/4 68/7 68/13 76/9 76/14 quit [2] 58/15 66/17 quotation [4] 59/2 59/6 59/7 59/12 quote [2] 8/2 59/11</p>														
R														
<p>ramifications [6] 54/13 55/15 55/21 57/21 58/22 73/23 re [14] 8/1 8/16 9/5 10/8 11/8 19/22 38/14 39/22 54/12 55/16 70/2 70/3 70/14 73/21 re-commissioning [3] 8/1 8/16 9/5 re-installed [1] 10/8 re-manufacturer [8] 19/22 38/14 54/12 55/16 70/2 70/3 70/14 73/21 re-modify [1] 39/22</p>														

R		
re-work [1] 11/8	related [3] 14/25	requested [3] 20/1
read [9] 26/10 57/3	15/5 72/10	52/11 63/11
58/6 59/13 65/5	relates [4] 13/1	requesting [1] 55/11
65/15 71/21 71/22	18/5 71/23 72/4	require [2] 9/9 67/4
75/4	relative [6] 13/25	required [2] 24/5
reading [3] 22/10	15/2 40/12 42/2	40/9
25/20 58/12	62/23 65/1	requirements [1] 7/8
ready [1] 39/6	release [1] 44/5	research [1] 23/5
reason [2] 72/22	rely [1] 66/24	reserved [1] 4/4
75/10	remember [1] 57/9	reset [4] 26/2 47/22
reasonable [2] 35/19	reminding [1] 43/20	47/23 48/3
39/25	removal [3] 64/17	respective [2] 4/3
reasonably [1] 56/14	73/14 73/23	76/10
reasons [1] 75/9	remove [3] 37/13	responding [1] 71/9
recall [3] 66/14	39/22 73/20	responsibilities [1]
71/14 71/15	removed [12] 35/2	55/19
recalling [1] 27/13	35/23 37/10 37/15	responsibility [4]
receive [1] 69/17	38/7 41/2 42/23	55/14 55/18 57/20
Recess [1] 61/19	44/15 45/4 45/23	58/21
recollection [2]	63/11 72/24	responsible [1] 9/18
26/7 27/22	removing [1] 38/16	restroom [1] 61/18
record [3] 4/12 12/7	repeat [3] 26/14	result [3] 27/21
30/7	54/20 71/18	71/7 72/21
recorded [1] 46/19	rephrase [1] 71/19	resulted [4] 52/16
recording [1] 15/2	replacement [1]	71/9 72/8 72/25
records [4] 30/4	53/11	resumed [1] 69/12
30/8 51/2 68/18	replicate [5] 26/6	retained [1] 15/15
redesign [1] 62/7	45/18 48/10 48/12	review [13] 12/15
reduced [1] 76/16	51/11	15/1 23/5 23/6 23/11
redundant [17] 22/19	report [29] 6/20	24/20 24/24 25/8
34/17 38/19 39/17	11/22 11/25 11/25	28/8 28/25 61/15
40/5 40/9 40/15	12/3 24/6 25/4 25/9	69/15 69/18
40/25 41/3 42/4 43/1	25/9 25/20 25/22	reviewed [12] 16/3
43/14 44/7 56/23	25/23 26/9 27/18	16/5 25/5 26/22
59/23 62/17 67/15	29/5 29/9 29/11	27/17 28/4 28/19
refer [3] 12/23 67/8	29/24 30/24 36/10	28/21 29/6 69/14
70/5	36/15 49/2 49/7	69/14 69/15
reference [1] 27/7	64/24 65/8 69/4	reviewing [1] 25/4
referred [1] 26/22	69/14 70/5 70/9	Rice [1] 2/8
referring [14] 5/25	reported [2] 51/6	right [25] 5/12 6/23
6/7 23/10 25/10	51/22	11/16 13/3 15/24
28/15 41/8 43/11	reporter [4] 71/20	20/7 20/13 20/15
43/16 47/8 49/14	71/22 76/5 76/18	22/14 25/19 29/13
49/15 60/13 60/14	represent [1] 68/12	30/14 30/24 41/17
73/9	representative [5]	47/7 47/9 50/21 57/1
refers [3] 7/6 59/7	1/6 14/11 14/18	62/10 63/2 64/12
59/15	14/21 15/16	64/21 66/15 68/4
regard [1] 70/21	represented [1]	68/6
regarding [1] 25/4	14/16	RMR [4] 1/18 76/5
regardless [1] 45/21	reprimanded [1]	76/15 76/23
relate [4] 7/12 8/21	66/11	Robson [2] 1/20 4/15
22/16 57/19	request [2] 60/1	roll [1] 33/22
	60/10	root [1] 25/2

R
 routine [1] 36/13
 ROZELSKY [3] 2/3 3/5
 68/11
 rule [1] 4/20
 rules [3] 4/18 65/17
 66/6
 run [3] 7/2 44/5
 61/17
 Rung [1] 36/10

S
 S-A-R [1] 38/11
 safe [9] 9/25 33/18
 34/2 40/4 53/24 54/1
 67/12 73/1 73/2
 safely [1] 61/1
 safety [19] 7/8
 39/25 41/2 42/23
 44/15 52/17 54/13
 55/15 55/19 55/20
 55/22 55/23 56/5
 56/9 56/16 57/21
 58/22 66/22 73/23
 said [12] 8/7 18/22
 19/11 22/9 26/18
 54/19 62/19 69/24
 75/6 75/8 76/12
 76/15
 sales [1] 58/9
 same [4] 5/23 25/1
 28/24 49/25
 SAR [76] 2/16 17/16
 17/23 19/10 19/17
 19/21 19/25 20/2
 20/6 20/15 20/20
 20/21 21/19 22/7
 22/18 31/14 34/7
 34/25 35/1 35/20
 35/22 37/9 37/13
 37/15 37/19 37/23
 38/2 38/4 38/7 38/11
 38/18 38/22 39/16
 39/19 39/21 40/1
 40/22 45/4 45/6 52/6
 52/11 52/11 54/3
 54/5 54/6 54/7 54/8
 54/10 54/10 54/12
 54/23 55/14 55/16
 55/22 55/23 56/1
 56/3 56/18 57/6
 57/10 57/20 58/21
 58/24 58/25 59/1

59/2 59/23 60/17
 62/16 62/18 63/11
 64/23 70/1 73/20
 74/3 74/6
 SAR's [1] 45/23
 saw [4] 27/13 27/15
 28/14 28/15
 say [20] 4/25 6/3
 20/24 22/1 22/7
 30/15 30/16 40/23
 41/24 49/11 53/21
 53/22 53/22 53/23
 63/22 65/7 67/3 67/6
 70/19 73/2
 says [8] 21/19 21/22
 21/25 22/11 30/24
 55/8 57/5 61/11
 says work [1] 22/11
 scanned [1] 30/11
 scientific [1] 6/25
 scope [2] 22/10
 22/11
 sealing [1] 4/3
 Seattle [1] 24/15
 second [2] 5/17 7/19
 secondary [2] 40/15
 41/17
 section [1] 33/22
 see [13] 12/20 21/18
 21/22 21/25 23/3
 25/6 27/8 27/12
 28/11 30/23 42/11
 47/13 57/5
 seeing [1] 49/9
 seen [7] 11/19 55/6
 55/7 56/18 58/13
 58/13 62/5
 SEL [2] 17/14 17/16
 send [1] 33/23
 sense [1] 52/2
 sensing [1] 73/10
 sensor [11] 11/11
 53/3 54/2 59/1 59/6
 60/18 61/2 61/5 61/6
 71/1 71/15
 sensors [33] 9/17
 10/6 10/8 10/23 11/4
 11/5 11/8 11/9 52/1
 52/6 52/21 52/24
 53/5 53/7 53/10
 53/11 54/8 58/16
 59/8 59/11 59/24
 60/20 61/12 62/9

63/11 64/17 64/18
 70/2 73/3 73/9 73/15
 73/20 73/24
 sent [1] 49/7
 sequence [2] 19/2
 57/20
 service [8] 10/5
 48/14 50/8 50/14
 51/2 53/18 64/1 64/3
 set [4] 35/25 64/24
 65/8 76/11
 setup [1] 36/7
 She [1] 29/19
 shipped [1] 18/18
 short [3] 61/3 61/12
 61/17
 should [16] 13/18
 15/11 45/11 52/13
 52/16 53/17 54/12
 55/18 55/19 56/14
 58/14 59/3 59/5
 60/17 60/19 71/2
 shouldn't [1] 43/12
 show [2] 55/5 58/9
 showed [2] 15/3 15/7
 shows [3] 36/1 46/24
 53/9
 side [1] 42/17
 side of [1] 42/17
 similar [6] 5/20
 12/14 13/12 24/7
 24/8 40/8
 simple [1] 38/11
 since [4] 13/8 24/25
 68/15 69/4
 single [1] 19/24
 sir [2] 59/12 59/18
 site [2] 39/2 39/3
 situation [4] 18/14
 18/16 54/3 74/7
 situations [1] 67/10
 slide [4] 36/10
 38/25 61/7 61/12
 slider [47] 20/23
 22/13 22/15 25/15
 25/21 25/24 26/3
 36/10 41/16 42/10
 43/7 43/15 44/3 44/7
 44/8 44/17 44/24
 45/11 46/21 47/14
 47/16 47/21 48/8
 48/21 48/24 49/8
 49/13 49/20 50/20

S			
slider... [18]	51/2	Sorry [1]	27/25
51/8 51/10 59/7 59/8		sort [2]	4/20 69/15
59/9 59/20 60/5 61/3		sound [1]	27/7
63/13 63/19 64/18		sounds [4]	11/15
66/12 70/21 70/24		16/15 27/4 27/6	
72/18 72/20 74/9		SOUTH [6]	1/1 2/4
sliders [21]	22/17	2/9 2/15 2/19 27/17	
32/24 33/23 42/1		speaking [1]	7/9
42/3 42/18 43/9 45/7		specific [4]	6/17
45/10 50/16 51/5		41/2 46/15 50/17	
51/15 51/17 53/11		specifically [4]	
59/15 63/5 63/10		22/2 36/23 37/5 67/8	
63/12 64/4 64/7		speeches [1]	6/1
65/17		spend [1]	56/15
Smith [1]	2/3	spent [1]	68/14
smithmoorelaw.com [1]		SS [1]	76/2
2/5		standard [2]	14/13
so [33]	4/19 8/14	74/4	
9/2 12/21 14/3 16/7		standards [6]	24/5
16/16 17/1 17/3		27/21 35/19 39/25	
19/21 23/18 27/3		55/20 70/12	
32/24 33/6 34/16		start [2]	36/9 47/20
42/4 42/10 43/1 47/5		started [1]	48/17
49/20 50/14 52/11		starting [3]	7/6
53/17 54/8 57/14		34/19 45/1	
67/2 67/19 69/9		state [5]	4/11 9/9
69/11 69/19 70/14		9/10 9/22 31/23	
71/6 74/13		stated [1]	62/16
software [7]	34/1	statement [5]	21/2
34/3 35/13 35/16		21/4 21/16 62/11	
35/17 37/7 62/20		66/19	
sole [1]	32/6	states [3]	1/1 22/12
solution [2]	52/17	39/13	
60/25		Ste [2]	2/4 2/14
some [16]	6/15 7/25	stenographically [1]	
12/8 13/5 26/21		76/15	
27/15 28/3 57/6 61/4		stepped [2]	13/7
62/16 63/25 64/14		37/20	
64/14 64/16 68/18		steps [2]	34/13 40/3
68/21		still [10]	5/1 31/9
somebody [2]	56/14	31/25 33/19 34/23	
60/15		35/14 37/18 46/9	
somehow [3]	5/2	46/17 69/19	
26/12 46/21		stipulated [1]	4/3
someone [3]	5/2	stomping [1]	27/7
47/23 49/6		stood [1]	55/17
someplace [1]	49/19	stop [8]	44/6 52/10
something [8]	17/16	60/23 61/3 61/7	
23/3 32/13 39/13		61/12 67/4 70/24	
42/11 67/5 71/4		stored [1]	30/10
71/11		Street [3]	1/20 2/4
sometime [2]	49/12	2/14	
		strikes [1]	23/23
		stuff [1]	57/6
		stumbled [2]	26/12
		26/20	
		sub [2]	9/16 36/13
		sub-contractor [1]	
		9/16	
		subscribed [2]	75/25
		76/19	
		substance [1]	75/7
		substantial [1]	
		70/16	
		Subway [1]	13/2
		successfully [1]	
		52/16	
		such [4]	18/5 24/5
		39/5 45/5	
		sudden [1]	6/3
		suggest [1]	57/1
		summaries [1]	30/16
		summary [4]	28/10
		64/25 65/2 69/16	
		supplied [1]	29/19
		supplier [5]	20/22
		20/24 22/12 59/19	
		60/5	
		SUPPLY [1]	1/11
		supposed [2]	49/18
		65/19	
		sure [14]	4/16 7/3
		12/17 26/15 33/16	
		56/2 56/4 56/6 59/14	
		61/16 63/13 66/2	
		68/8 69/25	
		surface [1]	45/11
		surround [1]	8/11
		switch [3]	47/24
		47/25 48/2	
		sworn [4]	4/7 75/25
		76/8 76/13	
		system [45]	17/20
		18/6 18/8 18/20	
		19/19 24/13 33/3	
		33/15 33/20 34/2	
		34/5 34/6 34/11	
		35/18 35/24 39/17	
		40/4 40/14 40/15	
		40/16 40/18 40/25	
		41/3 44/11 44/16	
		44/22 44/23 45/2	
		45/5 45/21 46/3	
		46/16 54/15 54/16	
		54/18 54/21 54/22	

S
 system... [8] 55/9
 56/14 56/17 57/22
 58/23 59/10 67/15
 72/8
 systems [2] 40/7
 40/9

T
 tag [2] 65/19 66/18
 take [5] 7/22 12/17
 55/18 61/15 61/17
 taken [7] 1/17 9/24
 30/10 53/18 67/1
 67/13 76/14
 taking [4] 39/15
 52/12 59/2 76/12
 talk [4] 10/3 11/24
 12/2 43/24
 talked [5] 17/8
 17/18 22/24 26/16
 73/14
 talking [17] 22/6
 23/22 24/17 25/1
 25/13 25/19 27/6
 28/14 35/9 35/10
 43/18 43/18 47/10
 50/20 51/6 69/21
 70/20
 target [1] 52/1
 team [1] 17/11
 technical [2] 58/25
 60/24
 tell [6] 12/12 13/20
 17/13 66/1 66/25
 68/14
 telling [2] 33/7
 34/16
 tells [2] 5/2 57/14
 Templeton [1] 2/13
 term [1] 8/17
 test [6] 7/14 36/17
 37/7 46/16 48/11
 52/15
 tested [3] 8/24
 25/24 47/6
 testified [2] 4/8
 76/11
 testify [3] 14/8
 66/5 76/8
 testimonies [1]
 12/13
 testimony [17] 5/12

12/7 26/22 36/1 47/1
 50/18 57/12 57/12
 57/14 58/18 61/13
 64/7 64/9 64/10
 65/15 66/9 76/19
 testing [6] 8/9
 18/19 33/19 36/24
 47/10 47/12
 Texas [1] 4/20
 than [9] 13/4 43/21
 44/14 53/13 56/7
 57/11 60/15 62/12
 62/17
 Thank [1] 70/10
 that [447]
 that's [61] 5/11
 5/16 8/7 12/6 15/12
 15/24 19/6 19/23
 20/6 20/12 21/12
 22/25 25/6 25/12
 25/12 25/14 25/17
 26/16 27/11 29/2
 29/13 29/22 30/13
 30/15 31/1 32/6
 38/21 40/17 42/20
 43/22 46/7 47/4 47/6
 48/1 48/17 48/22
 49/15 49/18 50/9
 50/11 50/21 50/23
 51/3 51/4 51/22
 53/12 55/11 55/13
 57/18 59/16 61/24
 61/25 66/19 66/20
 67/20 70/10 70/11
 70/13 70/25 74/1
 74/14
 their [21] 11/8
 15/21 23/20 23/22
 24/1 24/3 31/15
 31/19 41/15 44/15
 46/20 48/7 48/12
 49/2 49/13 58/7 60/4
 63/5 66/8 67/4 67/20
 them [14] 4/21 13/8
 14/13 16/7 25/13
 29/16 41/25 42/16
 52/11 52/16 57/7
 60/22 64/7 75/9
 themselves [9] 19/21
 34/7 34/25 35/20
 37/9 38/13 39/2 40/1
 40/2
 then [27] 7/17 7/24

9/2 9/16 18/21 19/7
 19/9 19/9 35/1 35/21
 37/10 37/21 38/15
 39/1 39/15 40/1
 40/23 41/25 42/12
 47/20 48/2 48/20
 50/22 53/22 64/2
 68/20 69/10
 there [77]
 there's [13] 6/2
 6/17 9/8 16/7 27/7
 32/5 41/25 41/25
 57/1 60/2 64/7 66/25
 71/4
 therefore [2] 51/16
 61/6
 these [7] 12/9 12/12
 14/3 14/5 39/1 55/18
 63/7
 they [135]
 they're [3] 30/17
 51/9 58/10
 thing [3] 22/18
 28/24 67/7
 things [27] 9/23
 9/25 12/9 22/16 24/5
 24/6 25/20 26/23
 26/24 27/6 33/17
 34/23 35/2 35/23
 37/10 39/1 39/19
 47/22 50/19 59/3
 60/2 60/6 62/19 65/1
 68/19 69/24 72/24
 think [21] 4/19 6/3
 8/8 11/4 13/11 13/11
 16/17 18/3 24/7
 26/11 29/24 49/12
 64/25 65/2 67/2
 67/17 69/4 69/11
 70/20 74/13 74/14
 third [1] 7/19
 this [56] 10/3 10/5
 12/6 12/14 13/12
 15/25 16/4 16/9
 16/18 18/3 19/21
 19/22 21/16 23/7
 23/19 24/4 24/8
 24/10 24/11 24/12
 27/21 29/5 29/9
 29/11 29/18 30/13
 33/18 34/17 36/18
 38/2 38/12 39/5 40/6
 40/15 42/6 45/10

<p>T</p> <p>this... [20] 50/1 53/14 54/14 55/7 56/14 57/5 57/16 58/23 62/14 64/22 68/15 69/10 70/19 72/9 72/14 72/25 74/7 74/14 75/25 76/20</p> <p>those [17] 15/20 16/5 17/5 18/6 22/14 24/6 26/25 36/4 53/13 54/7 60/21 63/16 65/1 65/3 72/13 73/9 74/8</p> <p>thought [3] 60/9 61/5 70/21</p> <p>threw [1] 65/23</p> <p>through [9] 12/8 13/7 16/14 17/2 23/22 27/12 28/13 65/14 68/1</p> <p>time [28] 4/4 12/17 15/9 18/9 30/5 30/8 31/3 31/4 31/8 31/9 31/12 42/6 47/9 49/6 49/21 49/23 50/1 51/19 53/19 56/15 57/16 62/14 63/6 68/21 72/20 73/21 74/10 74/15</p> <p>timeline [12] 10/20 10/22 11/13 11/17 19/4 22/24 23/2 30/19 30/21 51/21 53/9 53/14</p> <p>timely [1] 61/1</p> <p>times [9] 10/20 12/1 12/4 30/9 46/7 50/18 50/25 51/2 63/15</p> <p>today [1] 58/2</p> <p>told [4] 20/15 20/20 35/24 54/8</p> <p>too [1] 14/4</p> <p>took [8] 18/3 19/9 20/21 23/7 24/20 47/16 53/6 55/17</p> <p>TOOL [2] 1/10 2/6</p> <p>toppled [2] 13/22 15/9</p> <p>towards [1] 32/8</p> <p>training [1] 5/22</p> <p>transcript [3] 30/16</p>	<p>69/17 75/6</p> <p>transcription [1] 76/17</p> <p>transcripts [2] 69/16 69/16</p> <p>treadmill [3] 13/25 15/23 15/25</p> <p>trial [4] 4/5 5/12 12/21 12/21</p> <p>triggering [1] 60/22</p> <p>trip [4] 26/24 26/25 27/3 27/5</p> <p>tripped [2] 23/17 26/20</p> <p>trouble [2] 52/9 64/8</p> <p>troubleshooting [2] 25/12 25/18</p> <p>true [1] 75/5</p> <p>truth [3] 76/8 76/8 76/9</p> <p>try [2] 17/15 50/19</p> <p>trying [2] 12/20 66/1</p> <p>turn [2] 5/18 30/20</p> <p>turned [6] 7/10 18/10 18/21 25/25 49/12 56/13</p> <p>turning [1] 44/13</p> <p>turns [1] 9/16</p> <p>Twice [1] 63/15</p> <p>two [7] 17/5 25/2 51/6 53/13 58/11 59/23 63/16</p> <p>type [3] 24/4 24/11 24/12</p> <p>types [2] 18/7 24/5</p> <p>U</p> <p>unable [2] 17/13 51/11</p> <p>under [9] 12/19 12/21 12/23 13/13 22/11 25/8 25/9 26/25 76/17</p> <p>understand [8] 4/23 5/4 19/23 30/3 59/16 66/2 69/5 69/25</p> <p>understanding [16] 18/17 20/12 31/4 39/18 40/11 40/17 45/17 46/8 46/18 48/16 51/25 52/5</p>	<p>52/8 53/4 60/12 67/20</p> <p>UNITED [1] 1/1</p> <p>unless [2] 5/2 42/5</p> <p>Unlike [1] 12/8</p> <p>unsafe [1] 73/4</p> <p>until [4] 39/6 50/15 64/5 69/8</p> <p>up [22] 7/7 9/10 9/23 10/6 10/8 10/13 10/24 17/14 17/15 33/22 35/17 35/25 40/19 41/25 47/9 47/20 49/24 51/15 53/2 53/24 57/17 61/6</p> <p>upon [4] 8/11 8/21 9/3 66/16</p> <p>us [3] 12/13 21/7 66/1</p> <p>use [24] 6/20 18/10 31/2 31/7 31/10 31/11 31/17 32/3 32/5 32/7 32/9 32/12 32/13 32/18 33/6 33/13 39/6 41/14 48/17 48/18 55/2 61/1 63/3 66/23</p> <p>used [9] 9/12 10/7 11/4 31/14 31/25 32/21 33/22 42/4 52/16</p> <p>using [1] 8/17</p> <p>V</p> <p>valve [1] 67/15</p> <p>valves [1] 67/16</p> <p>various [7] 10/20 12/1 12/4 58/22 58/23 59/8 69/14</p> <p>vary [1] 67/11</p> <p>verification [6] 8/9 33/19 34/1 34/5 36/14 36/24</p> <p>verified [1] 46/18</p> <p>verify [8] 24/25 36/17 49/9 52/15 60/20 65/22 67/17 67/18</p> <p>verifying [3] 7/7 7/7 7/8</p> <p>version [1] 28/19</p> <p>very [5] 38/11 41/2</p>
--	--	--

V	WELDING [3] 1/11 2/6	when [33] 9/13 18/5
very... [3] 56/8	68/12	26/18 31/18 32/4
66/19 67/7	we'll [58] 5/22 6/5	32/9 34/11 34/14
violate [1] 27/20	6/16 7/6 7/21 8/20	34/19 35/25 36/7
violating [1] 66/5	10/21 12/19 13/18	37/2 37/6 38/13 39/5
W	16/7 17/8 18/3 19/3	43/12 44/5 44/6
wait [2] 13/18 42/11	21/21 23/14 23/20	44/13 46/3 47/6 47/9
waived [1] 4/4	24/1 24/25 29/24	47/16 48/17 54/7
walk [1] 32/24	30/7 31/9 31/22 32/5	54/24 58/10 60/18
WALL [5] 1/17 2/13	36/9 40/22 41/2	63/2 63/10 66/23
2/13 3/4 70/20	41/15 41/24 42/18	70/14 73/2
walltempleton.com [1]	43/25 44/1 47/13	where [18] 4/14 20/2
2/15	48/3 50/11 51/25	20/24 21/18 21/22
walter [1] 28/21	53/23 56/20 57/22	21/25 22/6 25/20
want [18] 6/3 6/12	60/2 60/3 62/13	30/9 32/21 36/13
16/13 24/25 31/6	62/23 63/13 63/21	45/11 49/8 57/5 58/6
33/10 40/24 41/7	64/12 64/21 64/25	59/6 59/11 70/11
47/14 52/7 53/21	65/13 66/4 66/19	whereof [1] 76/19
53/22 55/9 59/10	67/17 69/3 69/21	whether [7] 6/12
66/8 67/8 68/3 69/25	71/11 72/9 72/20	12/12 43/11 49/9
wanted [3] 39/20	73/14 74/6	52/19 53/2 73/12
40/5 40/7	went [13] 10/5 19/10	which [25] 5/13 6/15
warn [1] 73/22	19/10 24/21 25/24	8/17 9/4 13/1 16/4
was [196]	27/14 46/3 47/9	18/21 19/24 23/15
was not [1] 33/12	47/20 48/14 50/5	27/8 36/17 39/24
Washington [3] 2/4	53/1 63/19	41/20 45/3 49/11
13/2 13/22	were [66] 5/22 8/4	51/11 54/14 60/8
wasn't [1] 49/20	11/11 12/2 13/5 14/3	62/4 63/3 64/24 69/4
water [1] 28/3	14/21 15/4 15/5 16/9	69/18 70/5 72/8
way [10] 10/2 26/21	22/6 26/18 27/4	while [3] 11/25 45/7
33/25 51/12 51/12	27/15 31/24 33/4	67/25
51/22 54/16 55/10	34/23 34/23 35/11	who [17] 7/13 15/15
69/11 73/12	36/2 36/4 36/4 36/14	16/18 16/21 27/9
we [26] 5/12 5/20	39/3 39/3 40/7 40/11	29/3 29/11 35/24
10/2 12/17 17/8 18/3	40/11 42/2 42/4	39/4 39/8 48/2 52/22
18/4 19/11 24/25	43/17 44/4 44/4 44/4	52/22 54/5 54/18
26/16 29/14 30/7	44/11 45/6 45/6 46/7	54/21 54/21
30/7 38/21 43/16	46/9 48/17 50/18	whoever [1] 17/6
43/22 47/8 47/10	51/11 51/24 52/8	whole [2] 16/13 76/8
50/12 51/6 57/14	52/10 53/11 54/14	whom [1] 61/14
57/18 60/9 63/18	57/14 58/17 61/12	whose [1] 67/14
65/11 69/21	62/19 63/7 64/6	why [7] 12/20 16/24
we'll [5] 12/5 16/7	64/16 65/17 65/19	25/6 40/5 51/23 52/7
42/25 43/24 65/25	66/5 66/11 68/23	72/13
we're [2] 24/25 38/6	70/20 72/10 72/12	will [4] 9/22 36/16
we've [2] 63/13	72/24 72/24 74/8	43/1 75/8
73/14	76/14	winter [1] 29/3
weather [1] 69/11	weren't [1] 42/4	winter's [1] 29/4
week [3] 27/25 47/12	west [1] 2/4	wire [1] 7/14
58/16	what [129]	WISE [4] 1/18 76/5
weeks [1] 48/12	what's [3] 8/23 32/6	76/15 76/23
we'l [1] 43/20	36/12	within [2] 5/23 6/6
	whatever [1] 53/22	without [1] 52/12

W
witness [6] 3/1 4/7
27/8 67/25 76/7
76/13
word [9] 6/2 6/18
6/19 6/20 6/24 7/4
11/4 28/16 28/20
work [67] 7/22 8/3
9/3 9/3 9/13 10/19
11/8 17/2 20/4 20/22
20/24 21/2 21/4
21/16 22/10 22/11
22/12 22/12 29/5
29/9 29/16 29/18
29/20 29/23 30/4
31/14 31/19 31/25
32/13 33/3 33/9
33/18 33/23 35/21
38/25 39/16 40/20
41/11 41/21 42/23
44/15 45/4 45/11
47/17 47/21 49/8
49/13 53/3 53/25
54/1 54/5 56/17
58/20 59/16 59/19
60/21 60/22 60/25
62/22 62/23 63/23
64/23 65/18 65/19
66/6 66/17 69/7
work-around [3]
53/25 54/1 58/20
workable [1] 53/24
worked [7] 5/24
10/25 11/10 25/25
29/11 44/12 50/24
worker [1] 65/16
workers [3] 5/23 6/6
64/9
working [24] 20/1
21/2 27/9 29/25
31/24 32/8 33/13
42/17 46/5 46/17
49/20 51/24 52/17
52/21 52/24 57/16
58/17 60/5 63/21
63/25 66/11 66/20
67/5 67/5
would [61] 5/13 5/25
6/5 6/5 6/8 7/21
7/22 7/24 8/20 8/21
8/21 9/2 11/10 12/19
12/23 14/4 15/10
15/19 16/19 17/3

17/5 18/4 18/19 23/3
26/25 29/12 29/19
29/20 30/1 30/10
30/15 30/16 30/20
33/3 34/4 35/18
41/24 44/5 44/6 45/7
46/19 50/19 52/14
52/17 54/17 57/19
60/21 60/24 60/25
62/14 64/15 65/1
66/15 66/24 68/21
70/15 70/18 70/19
71/6 71/7 71/7
wouldn't [1] 63/22
write [1] 49/24
write-up [1] 49/24
written [5] 6/8 6/11
6/24 60/13 64/24
wrong [12] 23/2
23/24 34/16 46/2
46/21 48/8 48/20
48/24 51/10 60/23
63/20 63/22
wrote [1] 23/21

Y

yeah [6] 13/20 21/10
54/19 54/21 69/5
69/21
year [1] 58/11
years [2] 12/7 58/11
Yep [1] 49/18
yes [43] 4/17 5/5
5/14 6/22 11/23 14/3
16/2 20/14 22/10
23/11 23/12 25/12
26/2 27/19 28/3 28/6
28/23 38/13 40/17
41/18 46/24 47/19
50/7 51/22 55/7
55/24 57/4 57/8
61/22 62/6 64/11
64/15 65/4 65/6
67/20 70/10 70/18
72/2 72/3 72/16
73/11 73/16 73/18
yet [1] 68/22
you [216]
you'd [5] 6/10 6/10
16/16 21/8 59/13
you'll [3] 5/18
59/22 70/9
you're [29] 4/21

5/10 5/25 6/7 6/12
8/2 9/9 9/10 10/4
11/7 17/22 18/8
20/25 23/10 25/10
25/18 28/14 33/7
34/16 43/11 45/13
49/10 50/19 56/21
59/12 61/2 64/10
66/9 73/9
you've [3] 4/16 7/2
69/3
your [53] 4/11 5/6
5/7 5/17 6/13 6/19
6/20 7/4 8/3 8/17
9/18 10/22 11/13
11/17 12/3 12/6
12/17 13/9 13/25
16/3 16/11 18/22
19/4 19/23 20/18
21/18 23/5 23/5
23/18 26/10 26/17
26/20 28/24 28/25
30/19 38/9 51/12
52/22 53/17 58/14
58/18 60/17 64/24
65/3 65/7 65/8 66/2
67/7 69/9 69/19 70/9
73/8 74/3